



City of York Local Plan

Proposed Modifications and Evidence Base Consultation 2021

Representations received

Volume 5 of 11

Responses SID378 to 399

<b>SID Reference</b>	<b>Representation</b>
73	Peter Heptinstall
75	Heslington Parish Council
84	Tim Tozer
91	Westfield lodge and Yaldara Ltd
102	Elvington Parish Council
114	Ian Henderson
118	Historic England
119	Environment Agency
122	York Racecourse
127	Christopher Stapleton
141	Oakgate Group PLC
160	CPRE North Yorkshire (CPRENY)
181	Gateway Development
182	KCS Developments
191	Martin Moorhouse
192	Selby District Council
199	Mr Jolyon Harrison
215	Wilberforce Trust
217	Peter Moorhouse
220	Mr M Ibbotson
228	The Bull Commercial centre
231	Fulford Parish Council
238	Gillian Shaw

253	Bellway Homes
255	Home Builders Federation
257	Henry Boot Developments Limited
260	Lovell Developments (Yorkshire) Ltd
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt
269	Janet Hopton
288	Wigginton Parish Council
298	New Earswick Parish Council
304	Huntington and New Earswick Liberal Democrats
316	Dunnington Parish Council
329	Murton Parish Council
333	Alison Stead
338	Alan Cook
339	Barratt David Wilson Homes
342	Andy Bell
344	National Grid
345	Defence infrastructure Organisation
350	Picton
351	McArthur Glen
358	Mark Miller
359	NHS Property Services Ltd
361	Cllr Andy D'Agorne
364	York Labour Party
366	NHS Property Services
372	Gladman Homes
375	Wheldrake Parish Council
378	Langwith Development Partner
381	Yorkshire Wildlife Trust
383	Natural England
393	Cllr Nigel Ayre – Residents of Heworth Without
399	Cllr Anthony Fisher
407	Rob Littlewood
418	Chris Wedgewood
422	Peter and David Nicholson
582	Landowners of land west of ST8
583	Redrow Homes, GM Ward Trust, Mr K Hudson, Mrs C Bowes, Mr and Mrs J Curry and Mrs E Crocker
585	Taylor Wimpey UK
590	York and North Yorkshire Chamber of Commerce
594	TW Fields
601	Procter Family
603	The Retreat York
604	L&Q Estates
607	Taylor Wimpey UK
612	Joseph Rowntree Housing Trust
613	Askham Bryan College

620	Galtres Garden Village Development Company
625	Roy Brown
825	Cllr Mark Warters
826	Pilcher Homes
833	George Wright
841	Jennifer Hubbard
849	University of York
863	Mr R Arnold
866	Mulgrave Developments Ltd/ Mulgrave Properties Ltd
867	Yorvik Homes
872	Jeffrey Stern
876	Joanne Kinder
878	Sarah Mills
879	Pat Mills
883	St Peter's School
888	Geoff Beacon
891	Redrow Homes
901	York St John University
920	J Owen-Barnett
921	Pauline Ensor
922	Peter Rollings
923	York Consortium of Drainage Boards
924	Jacqueline Ridley
925	John Pilgrim
926	Amanda Garnett
927	Rufforth with Knapton Parish Council
928	S Walton
929	Neighbourhood Plan Committee
930	Mal Bruce
931	Linda Donnelly
932	Vistry Homes
933	Crossways Commercial estates Ltd
934	Mulgrave Properties Ltd
935	York Housing Association, karbon Homes Ltd & Karbon Developments Ltd
936	Countryside Properties PLC
937	Andrew Jackson
938	Elvington parish Council
939	Friends of Strensall
940	John Burley
941	Karen Marshall
942	Stuart Gunson
943	Haxby St Mary's Parochial Church Council
944	North lane Developments
946	Gemma Edwardson
947	Maureen Lyon
948	Persimmon

949	York and Scarborough Teaching Hospitals NHS Foundation Trust
950	Kyle & Upper Ouse Internal Drainage Board
951	Stephensons
952	North Yorkshire County Council
953	Mr Adrian Kelly
954	York Green Party
955	Jomast Developments
956	Peter Vernon
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 Consortium)
958	M Beresford
959	Clifton (without) Parish Council
960	Jane Granville
961	Mrs Carole Arnold

September 2021

**From:** [REDACTED]  
**Sent:** 07 July 2021 15:35  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206029  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Composite Modifications Schedule April 2021 (EX/CYC/58)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2101).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2101).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2101).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2101).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

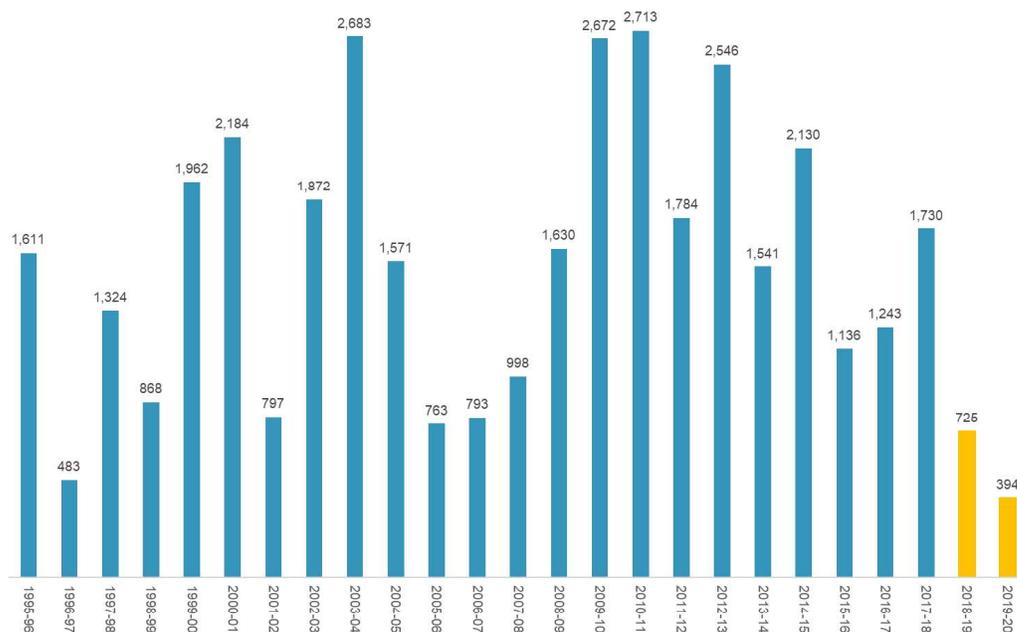
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16  
Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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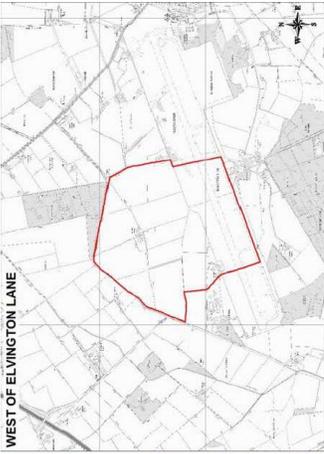
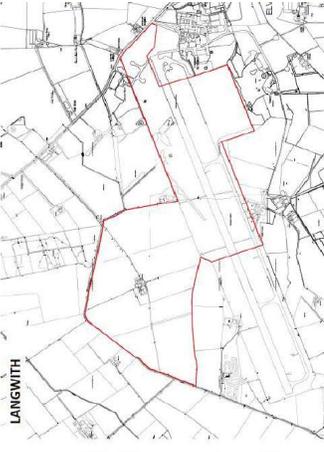




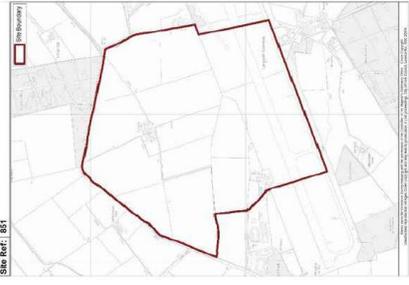
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

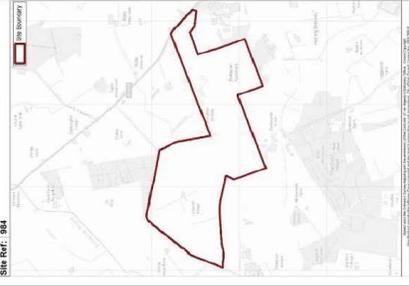
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>Langwith</b></p>		 <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>		<p><b>Spatial Strategy</b></p>	
<p><b>Land Submitted for Consideration</b></p>		<p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>	<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>

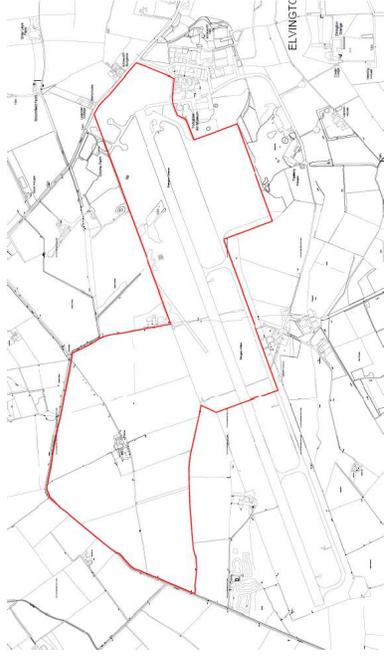
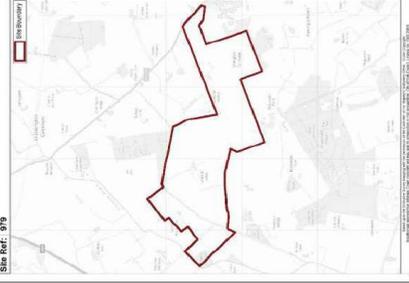
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Site Ref: 851



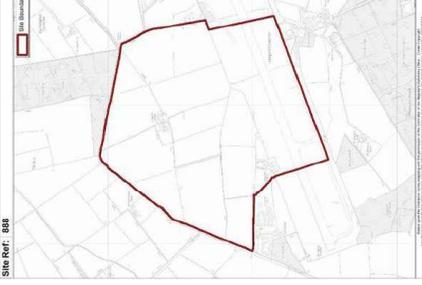
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



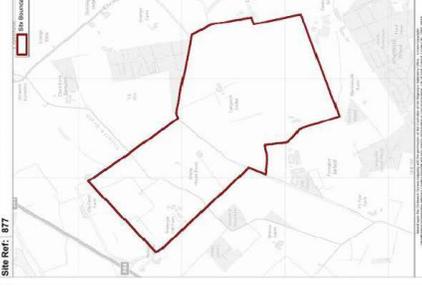
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



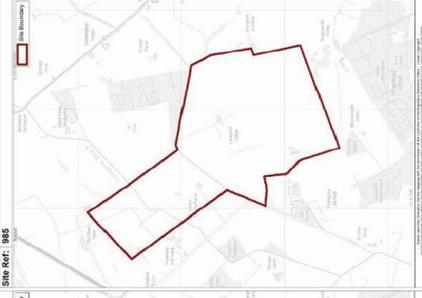
• Alt 3 Site 888 (Developer)  
Site Ref: 888



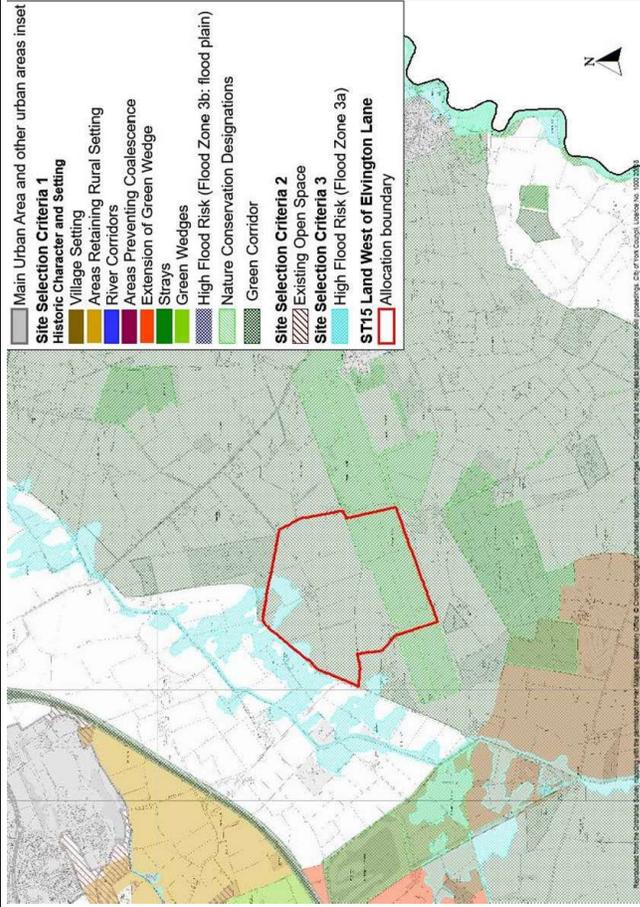
• Alt 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
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The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes		4.2	No	
	1.3	No		4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes		5.2	Yes	
	2.3	No		5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	3.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.
	3.2	No		3.2	No	

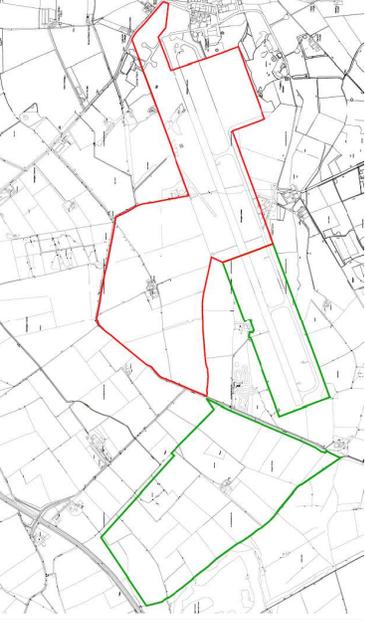
Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes		4.2	No	
	1.3	No		4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes		5.2	Yes	
	2.3	No		5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	3.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.
	3.2	No		3.2	No	

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



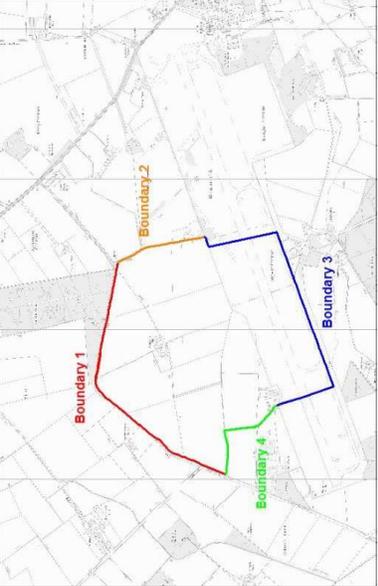
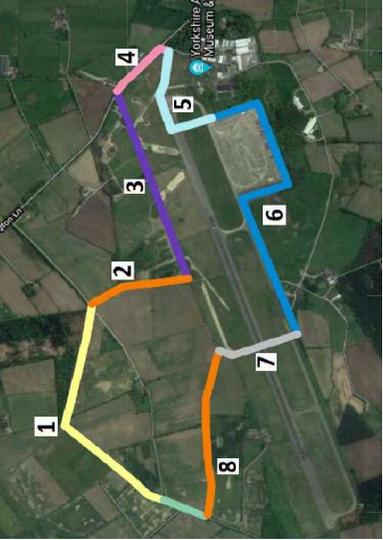
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Document Ref	Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>	

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
ST15	Site specific boundary considerations from Green Belt Purpose analysis.	Proposed boundary description and recognisability
<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.</p> <p>(ii) Must form an identifiable, compact self-sustaining settlement.</p> <p>(iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.</p> <p>(iv) Must respect historic recreational routes.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>
<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

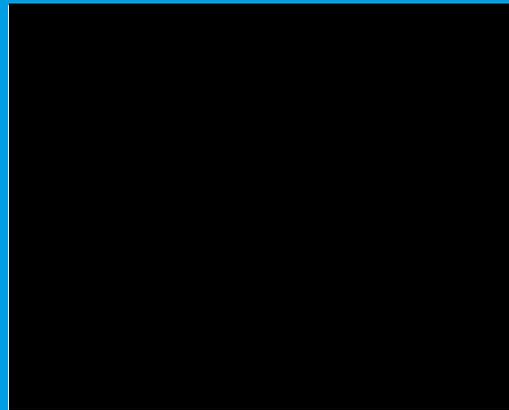
In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



## Quod

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**From:** [REDACTED]  
**Sent:** 07 July 2021 15:41  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206037  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: York Economic Outlook December 2019 (EX/CYC/29)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2101).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2101).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2101).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2101).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC. The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

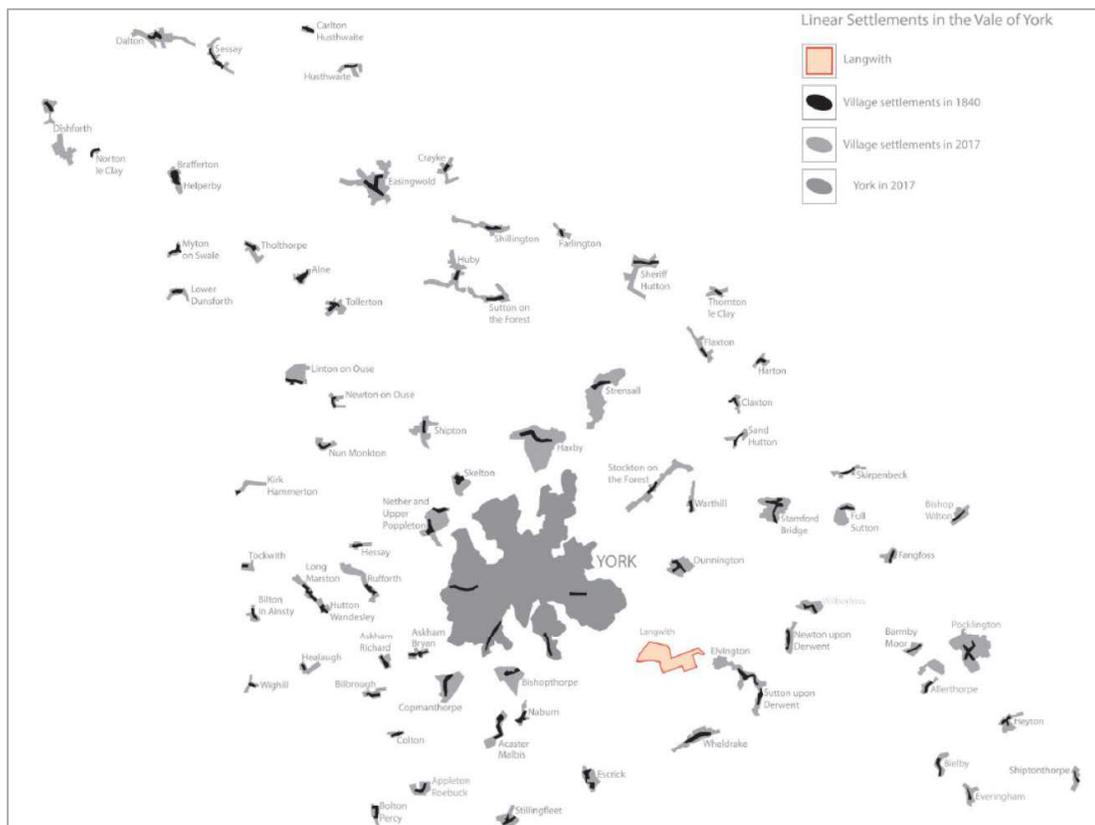
- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.

Figure 4.1: Linear Settlements of the Vale of York



- 4.17 Consequently, it is LDP’s view that the application of “compactness” as one of the tests for determining Green Belt boundaries for allocations should be applied differently to that of the main urban area of York. That is to say, it is not necessary for new freestanding settlements to be drawn up as a concentric form, and in fact as such that would be uncharacteristic of the settlements which surround York, which are linear.
- 4.18 Compactness does not necessarily mean a largely concentric form of development but, more so, a form that is self-contained. It is demonstrated in the previous Representations by LDP [EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) that Langwith can be carefully designed to provide strong and identifiable boundaries, which are well defined and capable of containing development in an appropriate manner without causing harm to the main purposes of York’s Green Belt.
- 4.19 It is LDP’s view that CYC’s reference to the compactness of the villages (see paragraph 8.23 of [EX/CYC/59](#) is recognising the need for them to be self-contained within a wider landscape setting, rather than in a concentric form.
- 4.20 For the reasons that have already been set out in previous evidence by LDP, and in this Report, it is important that the geographic scope of the new villages in the south east of the City need to be set in the context of setting a permanent Green Belt boundary that is capable of meeting the City’s housing needs, and that it should be set for an enduring period (i.e. at least 5 years post the plan period, (which LDP suggest should be extended 2038).

- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Introduction

Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

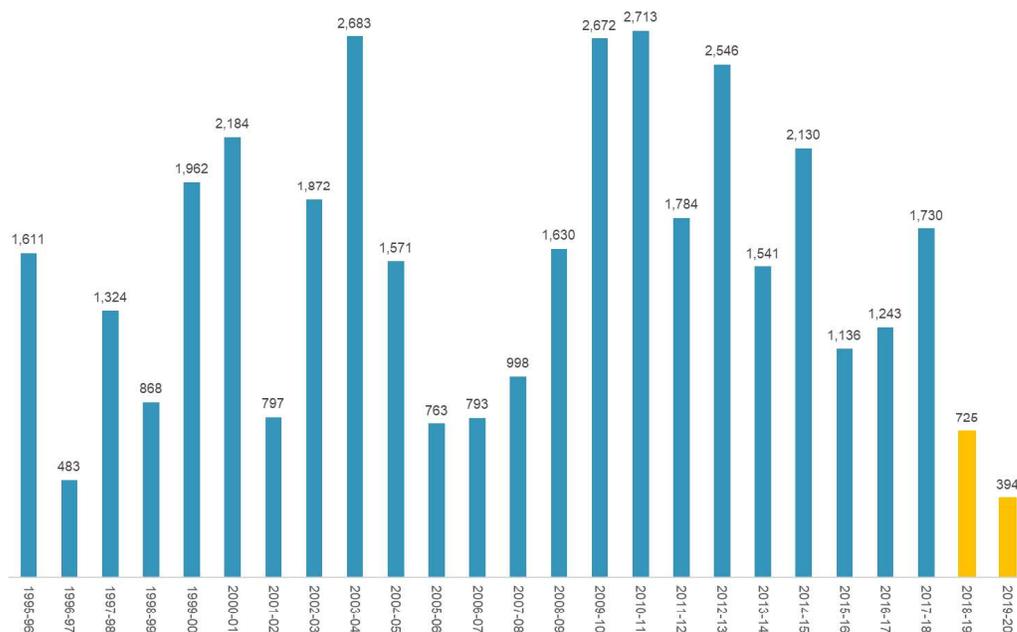
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates-for-the-uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

<b>Period Average</b>	<b>Average Employment</b>	<b>20% uplift to trend</b>	<b>Implied York Central impact on average employment</b>
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.

99. Section 6 (page 21) introduces the results for the Reprofiled Sectoral Growth scenario.

“Our detailed assumptions are as follows:

- 20% higher growth than the baseline projections within professional services, financial & insurance, and information & communication
- 10% lower growth than the baseline projections within wholesale & retail trade and accommodation & food services”

100. The 20% growth would seem to be linked, although it is not directly stated, with the York Central development. There is not a justification or explanation given for why there is lower growth in wholesale, retail and accommodation and food services specific to York.

101. If these were national trend there is no discussion of why this is relevant to York. Indeed, the latest available national data, show a decline in financial employment and increases in food and accommodation. York has seen a greater increase in food and accommodation business from 2009 – 2019 than the UK and England, and this sector is over represented, that is has a greater share than England and the UK.

102. Both food and accommodation and retail are key components of the York offer to visitors and tourists, as well as a large city with a rural hinterland. It does not seem credible without reasoned evidence to model this reduction.

103. If the reprofiled scenario (with these two specific changes to the updated baseline) are a means to model the York Central impact it should be showing the impact of this, as the Council state<sup>24</sup>:

“It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%. York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK”.

This would need to be read as over and above any prevailing growth trends.

104. The key outputs from EX/CYC/29 are recreated for reference below.

<b>GVA</b>				
	2017	2038	Change	%
<b>Baseline National</b>	5309	6929	1620	30.5
<b>Reprofiled</b>	5309	7030	1721	32.4

Data from

- Fig 3 2017 GVA
- Fig 15 2038 GVA and % Increase
- Change in £ Calculated for this report

<b>Employment</b>					
	2017	2038	Change	%	Annual
<b>Baseline National</b>	119531	129062	9531	7.97	454
<b>Reprofiled</b>	119531	130311	10780	9.02	513

Data from or calculated from Fig 16

<sup>24</sup> <http://www.yorkcentral.info/>

105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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Housing Delivery Trajectories

Total Housing

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period							
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	
	Total	35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	2940	280	280	280	280	280	280	280	280	280
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	2940	280	280	280	280	280	280	280	280	280
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted	35	70	103	154	154	206	206	206	105	105	105	105	210	210	280	1260	280	280	280	280	280	280	280	280	280
Length	Unadjusted Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)	103	103	103	154	154	206	206	206	206	206	206	206	257	257	2880	257	257	257	257	257	257	257	257	257	257
Length	Unadjusted Delivery Rate Scenario 2 (Bidwells: 232dpa peak) (adjusted start date due to Local Plan delay)	103	103	103	154	154	206	206	206	206	206	206	206	223	223	2386	223	223	223	223	223	223	223	223	223	223
Length	Unadjusted Delivery Rate Scenario 2 (Bidwells: 2300dpa peak) (adjusted start date due to Local Plan delay)	103	103	103	100	100	200	200	200	200	200	200	200	250	300	1375	300	300	300	300	300	300	300	300	300	300

Affordable Housing Only

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period							
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	
	Total	9	18	26	26	26	35	53	53	70	70	70	70	70	70	745	70	70	70	70	70	70	70	70	70	70
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	9	18	26	26	26	35	53	53	70	70	70	70	70	70	745	70	70	70	70	70	70	70	70	70	70
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted	9	18	26	26	26	35	53	53	70	70	70	70	70	70	745	70	70	70	70	70	70	70	70	70	70
Length	Unadjusted Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)	26	26	26	39	39	52	52	52	216	216	216	216	216	216	315	216	216	216	216	216	216	216	216	216	216
Length	Unadjusted Delivery Rate Scenario 2 (Bidwells: 232dpa peak) (adjusted start date due to Local Plan delay)	26	26	26	39	39	52	52	52	216	216	216	216	216	216	315	216	216	216	216	216	216	216	216	216	216
Length	Unadjusted Delivery Rate Scenario 2 (Bidwells: 2300dpa peak) (adjusted start date due to Local Plan delay)	26	26	26	25	25	50	50	50	56	56	56	56	56	56	344	56	56	56	56	56	56	56	56	56	56

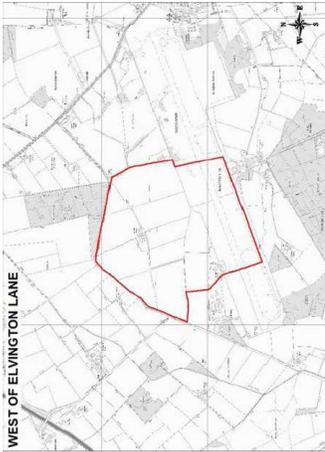
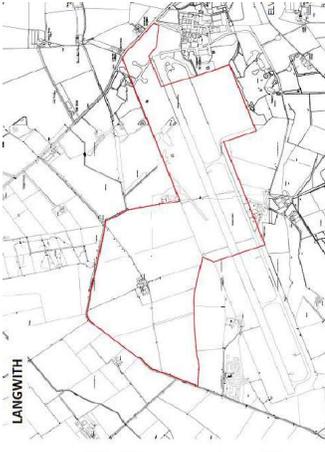
See Appendix 5 LDP's Representations to the York Local Plan PMS (June 2019) for background to above assumptions.



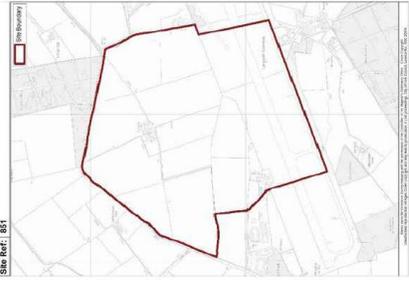
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

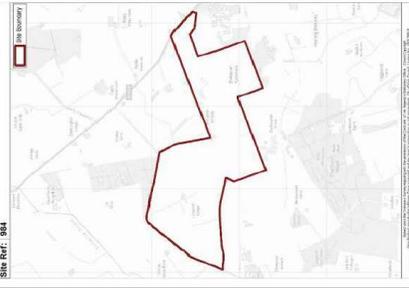
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>				
<p><b>Spatial Strategy</b></p>				
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p> <p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>				

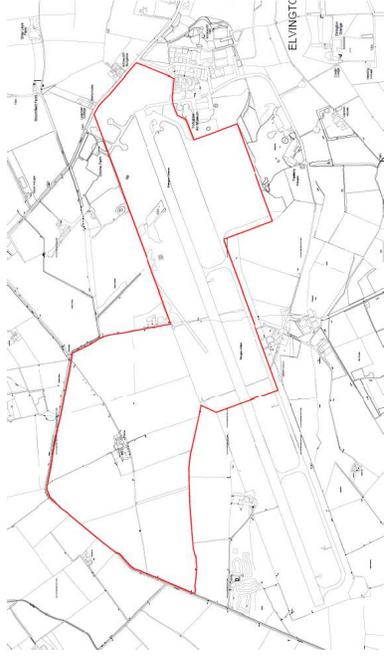
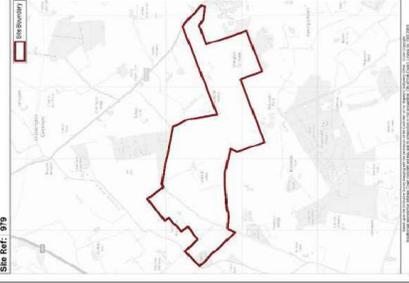
• Allocation – Site 851  
Site Ref: 851



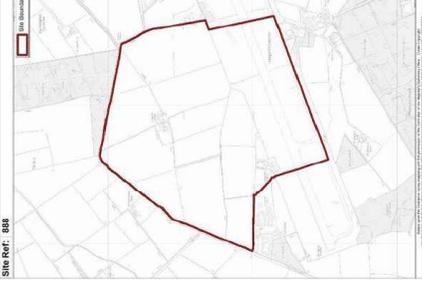
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



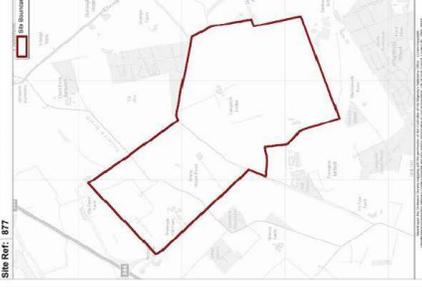
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



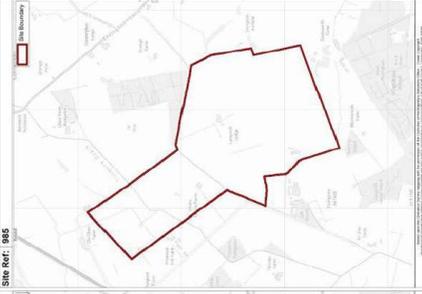
• Ait 3 Site 888 (Developer)  
Site Ref: 888



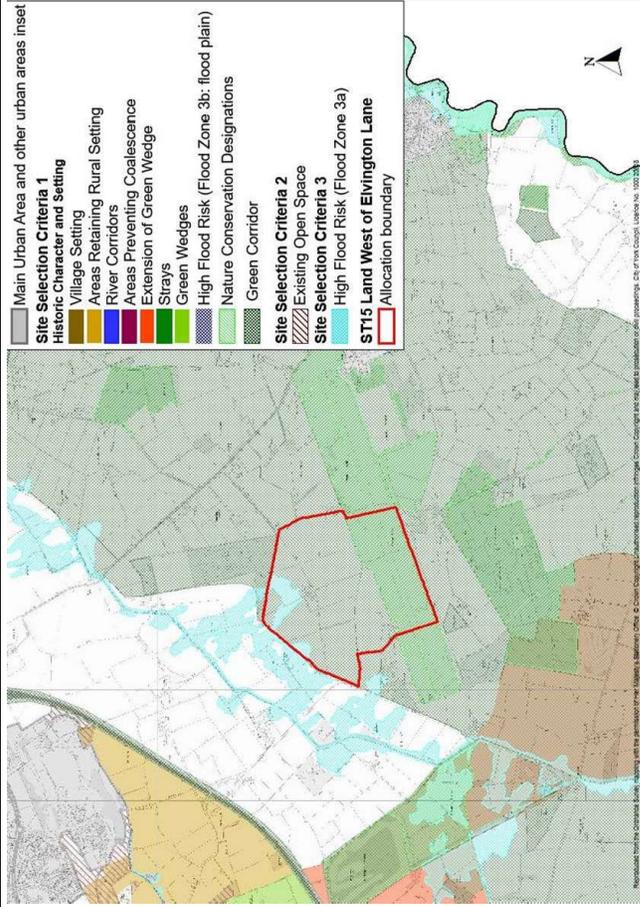
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes		4.2	No	
	1.3	No		4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes		5.2	Yes	
	2.3	No		5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	3.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.
	3.2	No		3.2	No	

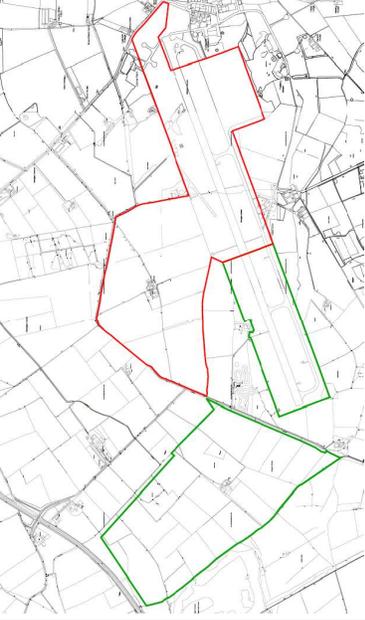
Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes		4.2	No	
	1.3	No		4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes		5.2	Yes	
	2.3	No		5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise. <td>3.1</td> <td>Yes</td> <td rowspan="2">The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.</td>	3.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.
	3.2	No		3.2	No	

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



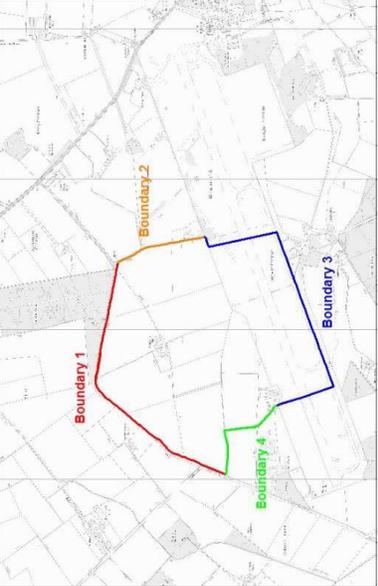
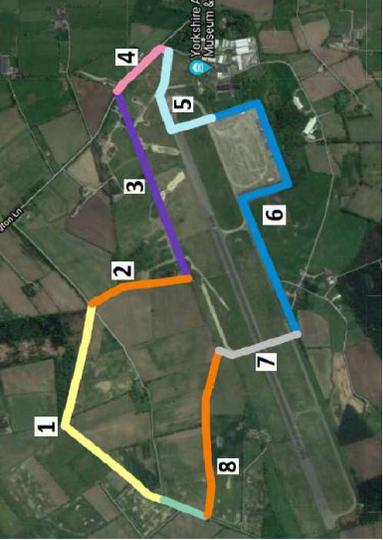
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<b>ENCROACHMENT OVERALL.</b>
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Sustainability Appraisal		
ST15	Document Ref	Langwith
<p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<ul style="list-style-type: none"> <li>• SA main report (2018)</li> <li>• [CD008] Strategic Sites, page 116.</li> <li>• SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>• [CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>• SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
<b>ST15</b>	<b>Site specific boundary considerations from Green Belt Purpose analysis.</b>	<b>Proposed boundary description and recognisability</b>
	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.</p> <p>(ii) Must form an identifiable, compact self-sustaining settlement.</p> <p>(iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.</p> <p>(iv) Must respect historic recreational routes.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p> <p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>
	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p> <p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 15:51  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206044  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Affordable Housing Note Final February 2020 (EX/CYC/36)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

[Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC. The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

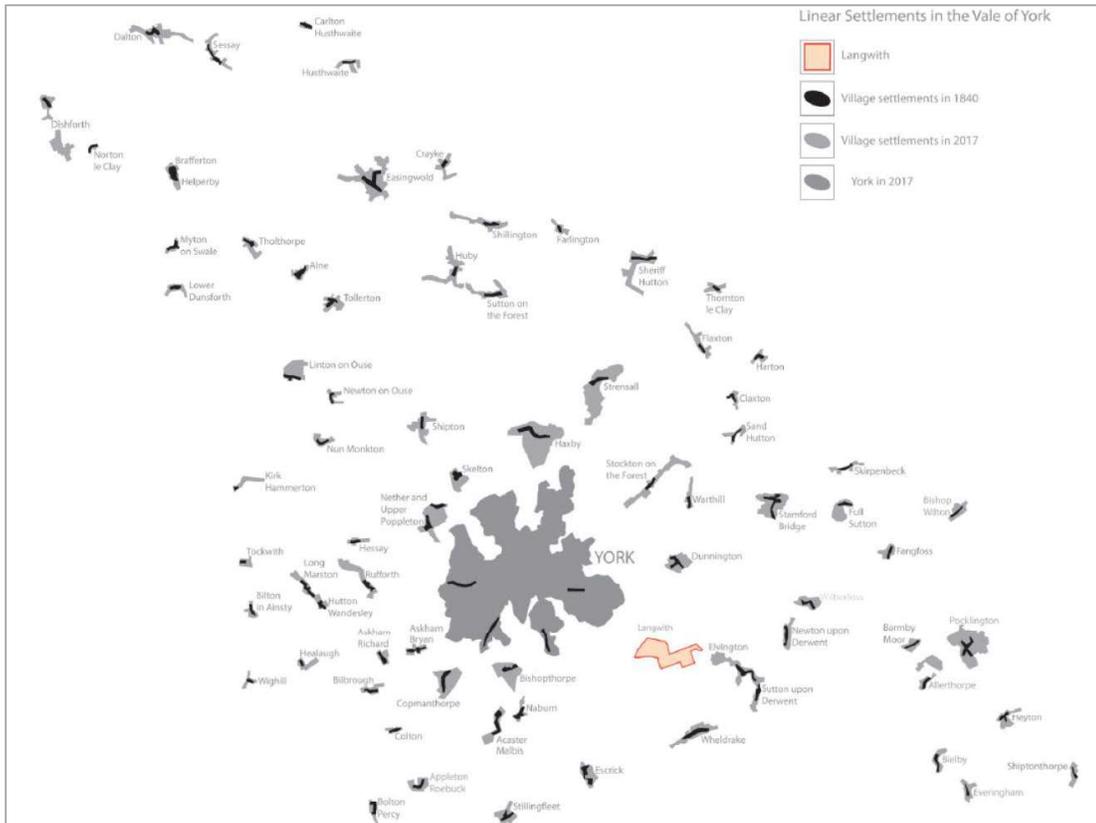
- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.

Figure 4.1: Linear Settlements of the Vale of York



- 4.17 Consequently, it is LDP’s view that the application of “compactness” as one of the tests for determining Green Belt boundaries for allocations should be applied differently to that of the main urban area of York. That is to say, it is not necessary for new freestanding settlements to be drawn up as a concentric form, and in fact as such that would be uncharacteristic of the settlements which surround York, which are linear.
- 4.18 Compactness does not necessarily mean a largely concentric form of development but, more so, a form that is self-contained. It is demonstrated in the previous Representations by LDP [EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) that Langwith can be carefully designed to provide strong and identifiable boundaries, which are well defined and capable of containing development in an appropriate manner without causing harm to the main purposes of York’s Green Belt.
- 4.19 It is LDP’s view that CYC’s reference to the compactness of the villages (see paragraph 8.23 of [EX/CYC/59](#) is recognising the need for them to be self-contained within a wider landscape setting, rather than in a concentric form.
- 4.20 For the reasons that have already been set out in previous evidence by LDP, and in this Report, it is important that the geographic scope of the new villages in the south east of the City need to be set in the context of setting a permanent Green Belt boundary that is capable of meeting the City’s housing needs, and that it should be set for an enduring period (i.e. at least 5 years post the plan period, (which LDP suggest should be extended 2038).

- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Introduction

Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

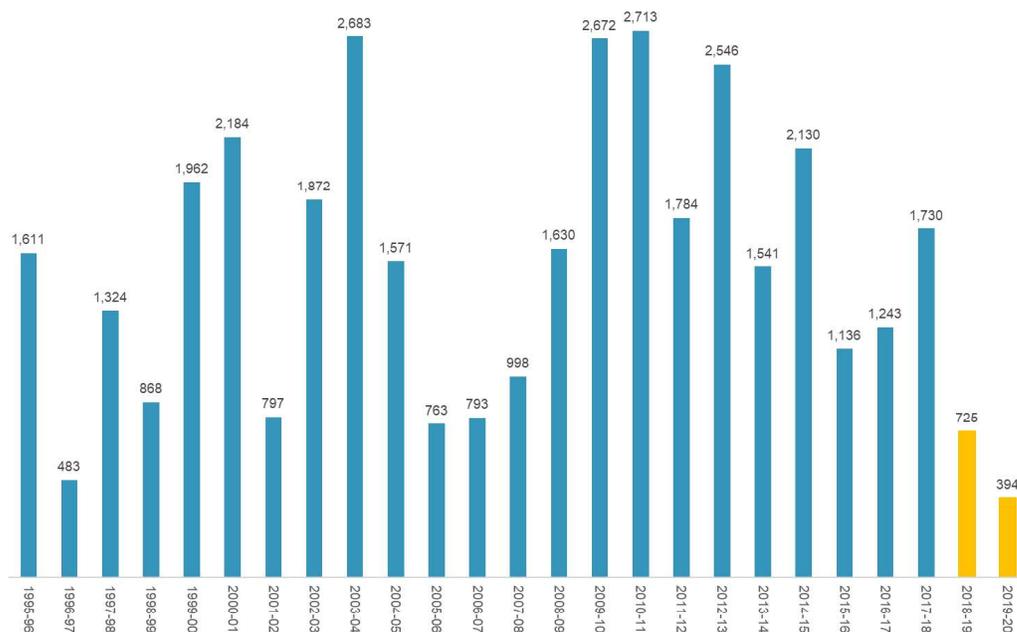
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates-for-the-uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 /£8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

<b>Period Average</b>	<b>Average Employment</b>	<b>20% uplift to trend</b>	<b>Implied York Central impact on average employment</b>
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

“Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018”

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher “York” growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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Housing Delivery Trajectories

Total Housing

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period							
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	
	Total																									
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	2940	309	280	280	280	280	280	280	280	280
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																									
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	103	103	103	154	154	206	206	206	206	206	206	206	206	206	257	2880	257	257	257	257	257	257	257	257	257
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	223	223	223	223	223	223	223	2386	223	223	223	223	223	223	223	223	223
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	250	300	300	300	300	300	300	2875	300	300	300	300	300	300	300	300	300

Affordable Housing Only

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period							
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	
	Total																									
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	9	18	26	26	26	35	53	53	70	70	70	70	70	70	725	100	70	70	70	70	70	70	70	70	
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																									
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	26	26	39	39	39	52	52	52	52	64	64	64	64	64	64	64	64	64	64	64	64	64	64	64	
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	56	56	56	56	56	56	597	56	56	56	56	56	56	56	56	56	
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	63	75	75	75	75	75	719	75	75	75	75	75	75	75	75	75	

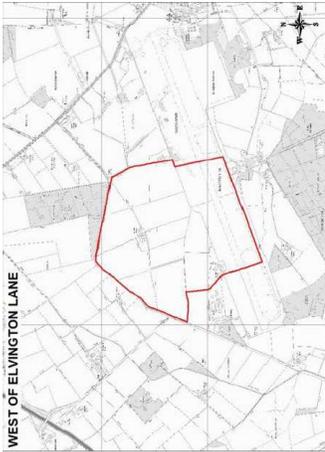
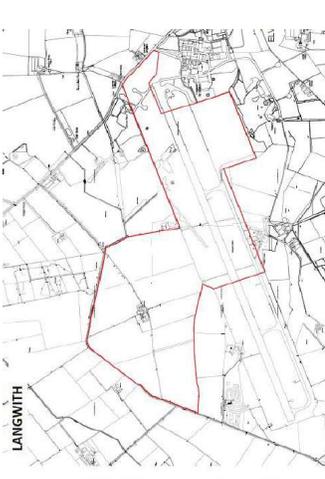
See Appendix 5 LDP's Representations to the York Local Plan PMS (June 2019) for background to above assumptions.



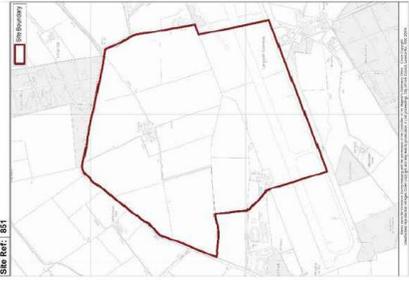
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

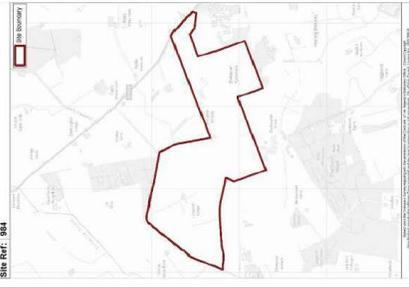
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<p><b>ST15</b></p>	 	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>
<p><b>Langwith</b></p>	 	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>		
<p><b>Spatial Strategy</b></p>		
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p> <p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>		

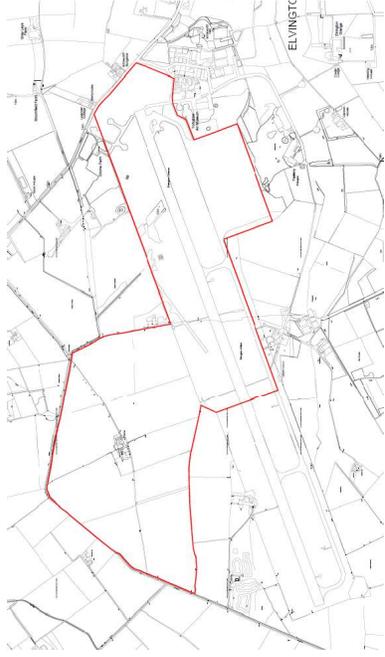
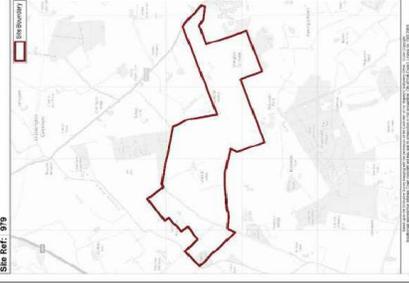
• Allocation – Site 851  
Site Ref: 851



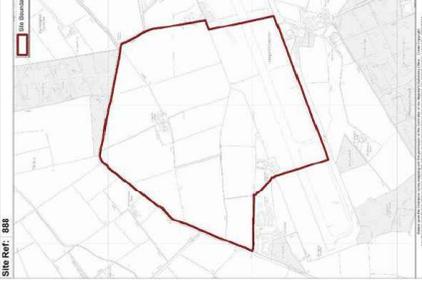
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



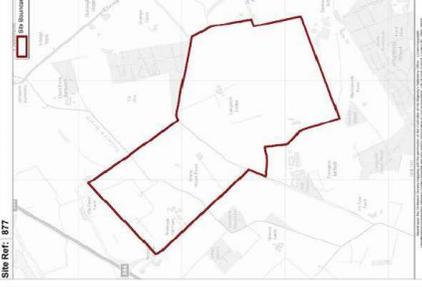
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



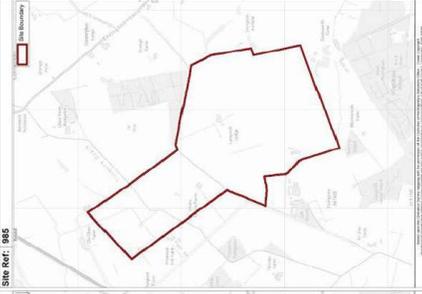
• Ait 3 Site 888 (Developer)  
Site Ref: 888



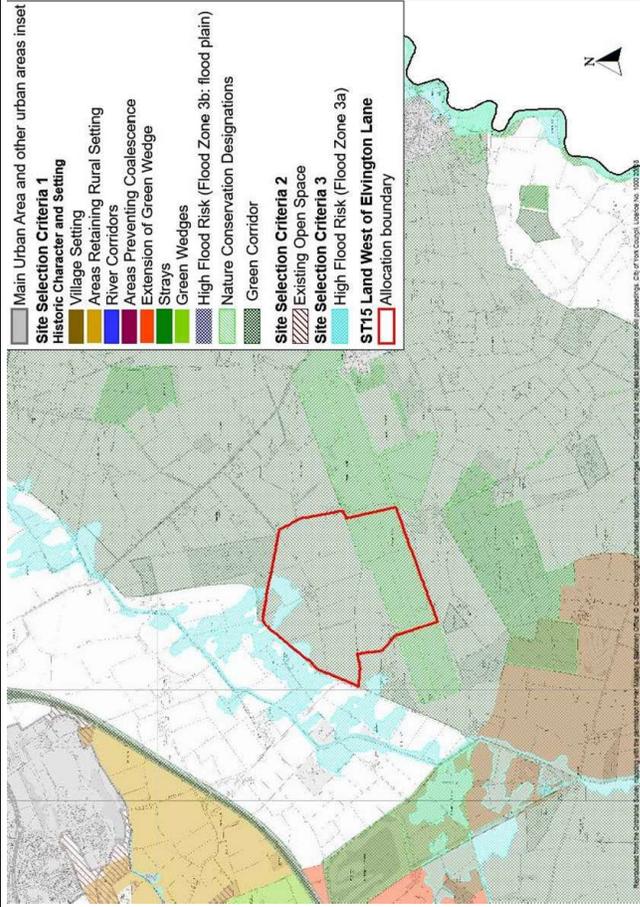
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl			Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Purpose 3 – Encroachment distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.	
	1.2	Yes	4.1	Yes	4.2			No
	1.3	No	4.3	No	4.3			No
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment			Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	
	2.2	Yes	5.1	Yes	5.2			Yes
	2.3	No	5.3	Yes	5.3			Yes
Criterion 3: Landscape & Setting	3.1	Yes				The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.		
	3.2	No						

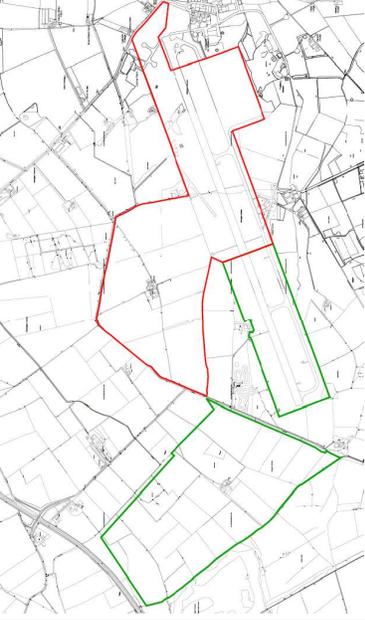
n/a

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl			Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Purpose 3 – Encroachment distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.	
	1.2	Yes	4.1	Yes	4.2			No
	1.3	No	4.3	No	4.3			No
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment			Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	
	2.2	Yes	5.1	Yes	5.2			Yes
	2.3	No	5.3	Yes	5.3			Yes
Criterion 3: Landscape & Setting	3.1	Yes				The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.		
	3.2	No						

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



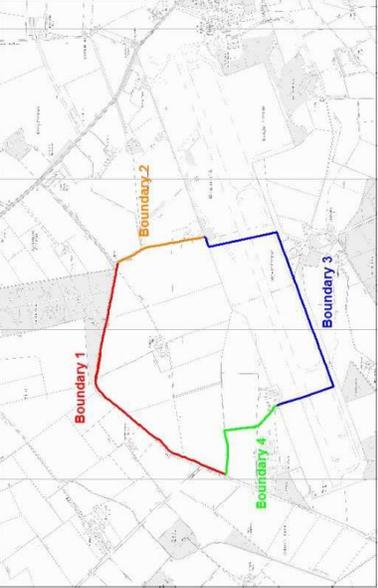
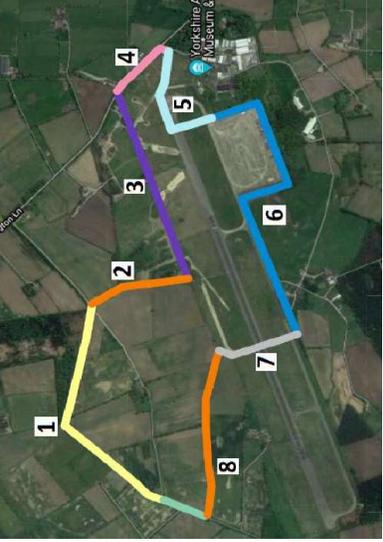
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Document Ref	Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>	

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>ST15</b>		
<b>Langwith</b>		
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>		<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

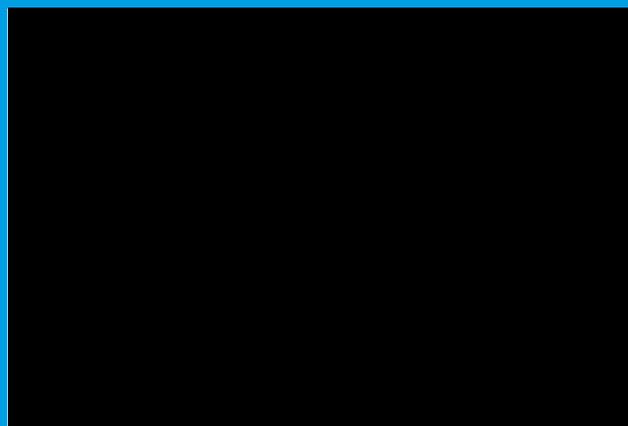
In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod

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**From:** [REDACTED]  
**Sent:** 07 July 2021 15:47  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206041  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019 (EX/CYC/32)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC. The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Introduction

Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

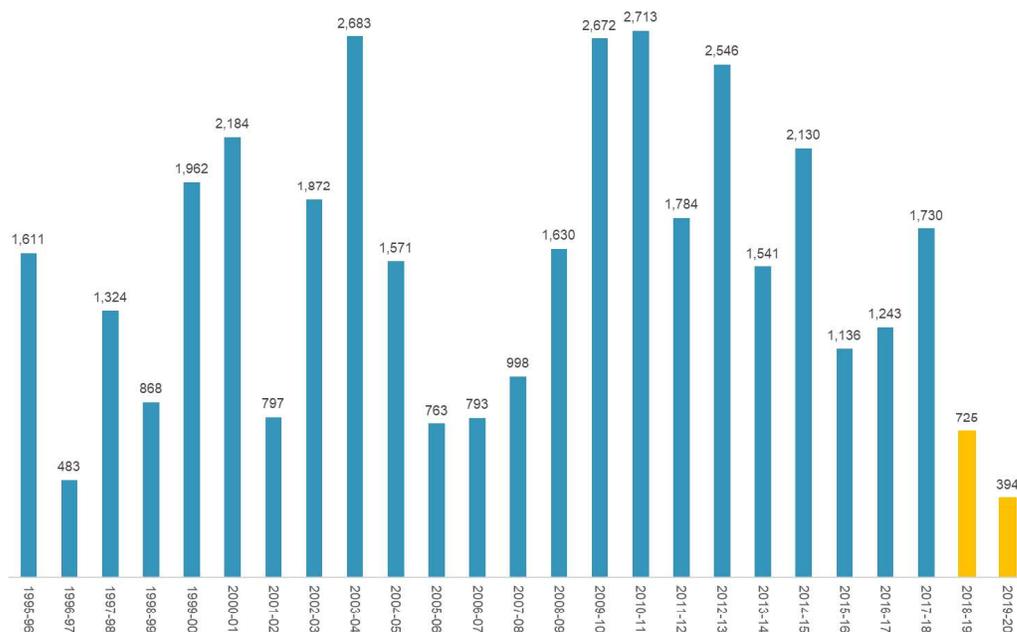
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16  
Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York’s economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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Housing Delivery Trajectories

Total Housing

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period							
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	
	Total																									
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	2940	309	280	280	280	280	280	280	280	280
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																									
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	103	103	103	154	154	206	206	206	206	206	206	206	206	206	257	2880	257	257	257	257	257	257	257	257	257
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	223	223	223	223	223	223	223	2386	223	223	223	223	223	223	223	223	223
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	250	300	300	300	300	300	300	2875	300	300	300	300	300	300	300	300	300

Affordable Housing Only

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period							
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	
	Total																									
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	9	18	26	26	26	35	53	53	70	70	70	70	70	70	745	100	70	70	70	70	70	70	70	70	
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																									
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	26	26	26	39	39	52	52	52	52	52	52	52	52	52	64	720	64	64	64	64	64	64	64	64	
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	56	56	56	56	56	56	56	597	56	56	56	56	56	56	56	56	
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	63	75	75	75	75	75	719	75	75	75	75	75	75	75	75	75	

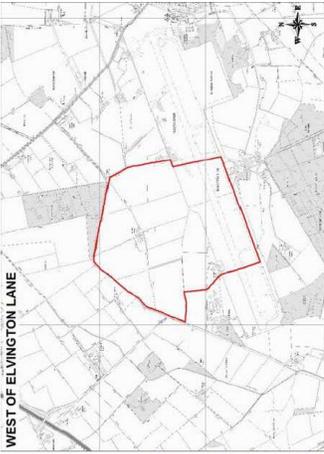
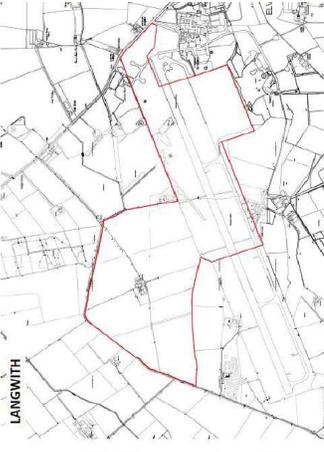
See Appendix 5 LDP's Representations to the York Local Plan PMS (June 2019) for background to above assumptions.



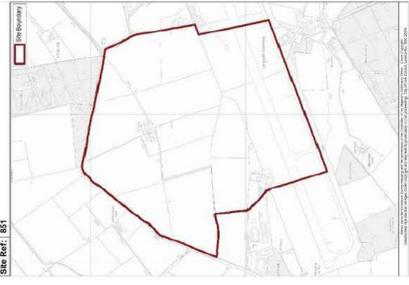
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

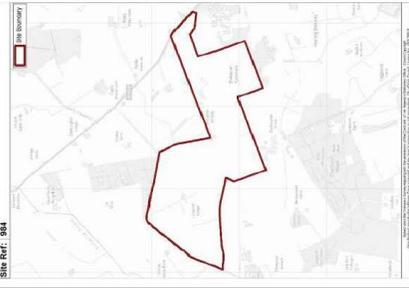
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>Langwith</b></p>		 <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>		<p><b>Spatial Strategy</b></p>	
<p><b>Land Submitted for Consideration</b></p>		<p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>	<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>

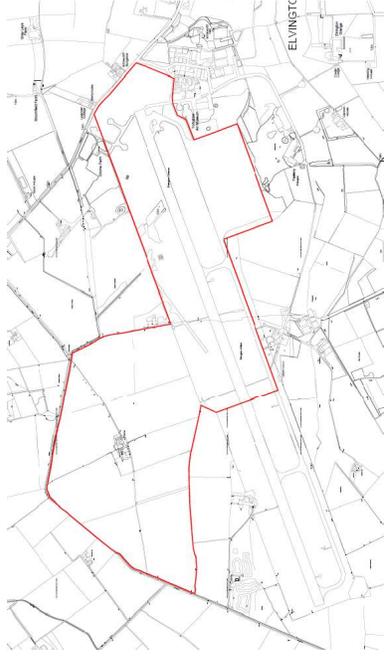
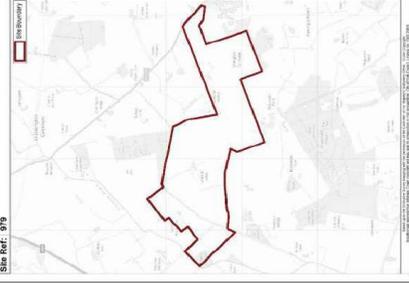
• Allocation – Site 851  
Site Ref: 851



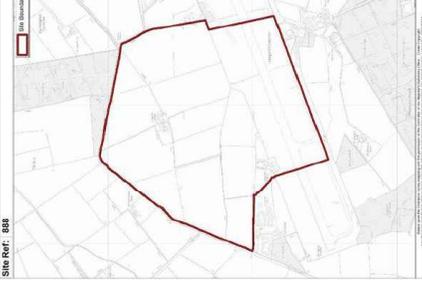
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



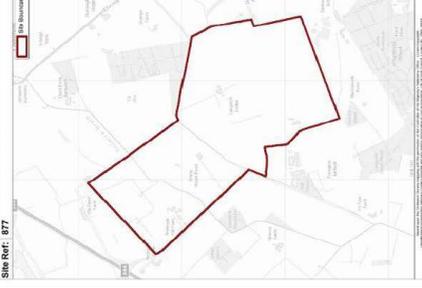
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



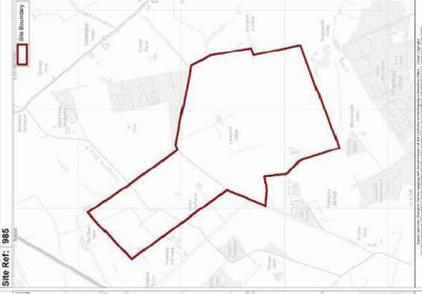
• Alt 3 Site 888 (Developer)  
Site Ref: 888



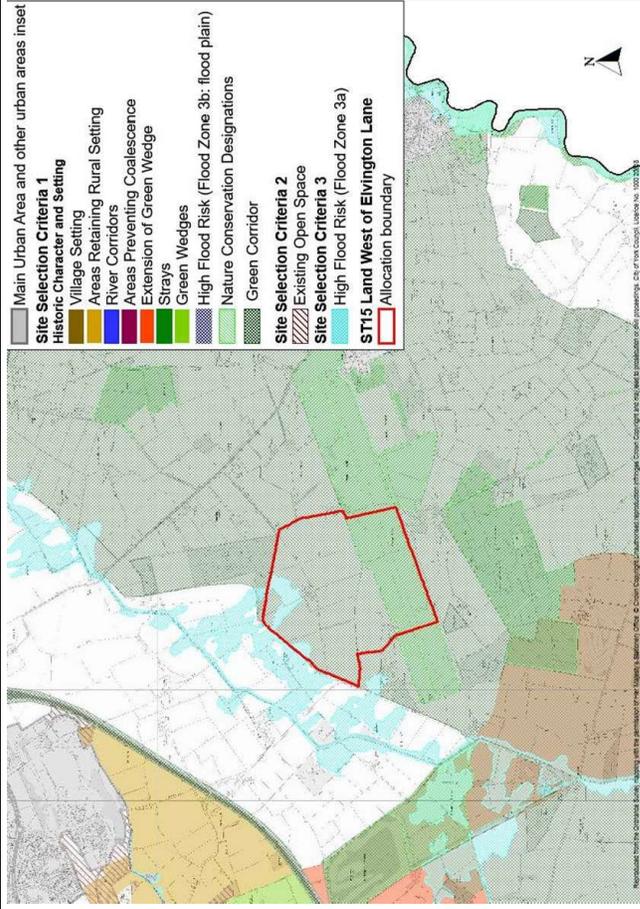
• Alt 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severalextrajunctions / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severalextrajunctions / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include stand-alone settlements helps to avoid harm by reason of urban sprawl.	
	1.2	Yes		4.2	No		
	1.3	No		4.3	No		
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of stand-alone settlements in York is accepted. Spatial distribution to include stand-alone settlements helps to avoid any significant harm by reason of encroachment overall.	
	2.2	Yes		5.2	Yes		
	2.3	No		5.3	Yes		
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

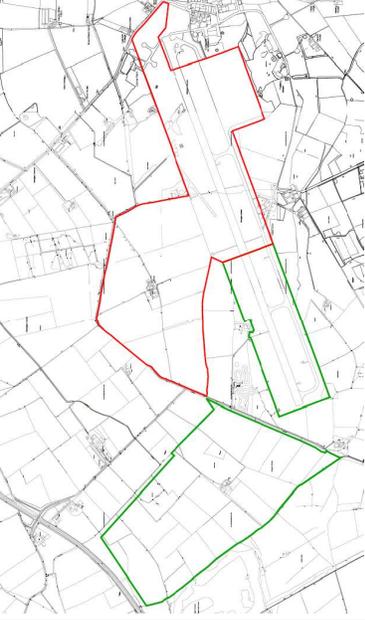
Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include stand-alone settlements helps to avoid harm by reason of urban sprawl.	
	1.2	Yes		4.2	No		
	1.3	No		4.3	No		
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of stand-alone settlements in York is accepted. Spatial distribution to include stand-alone settlements helps to avoid any significant harm by reason of encroachment overall.	
	2.2	Yes		5.2	Yes		
	2.3	No		5.3	Yes		
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a free-standing settlement 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



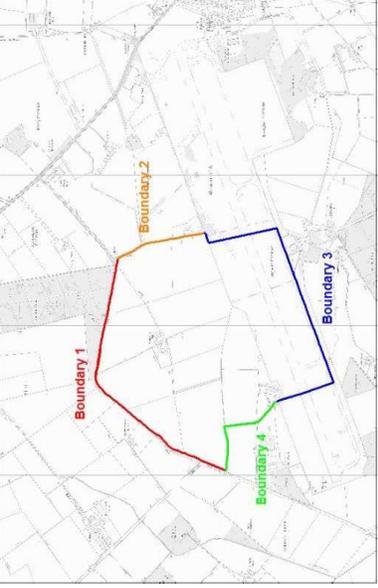
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Document Ref</b></p> <ul style="list-style-type: none"> <li>• SA main report (2018)</li> <li>• [CD008] Strategic Sites, page 116.</li> <li>• SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>• [CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>• SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
<b>ST15</b>		
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p>Permanence of proposed boundary</p>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to the reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



## Quod

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**From:** [REDACTED]  
**Sent:** 07 July 2021 16:10  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206056  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Approach to defining Green Belt Addendum January 2021 (EX/CYC/59)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Background

Introduction

Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

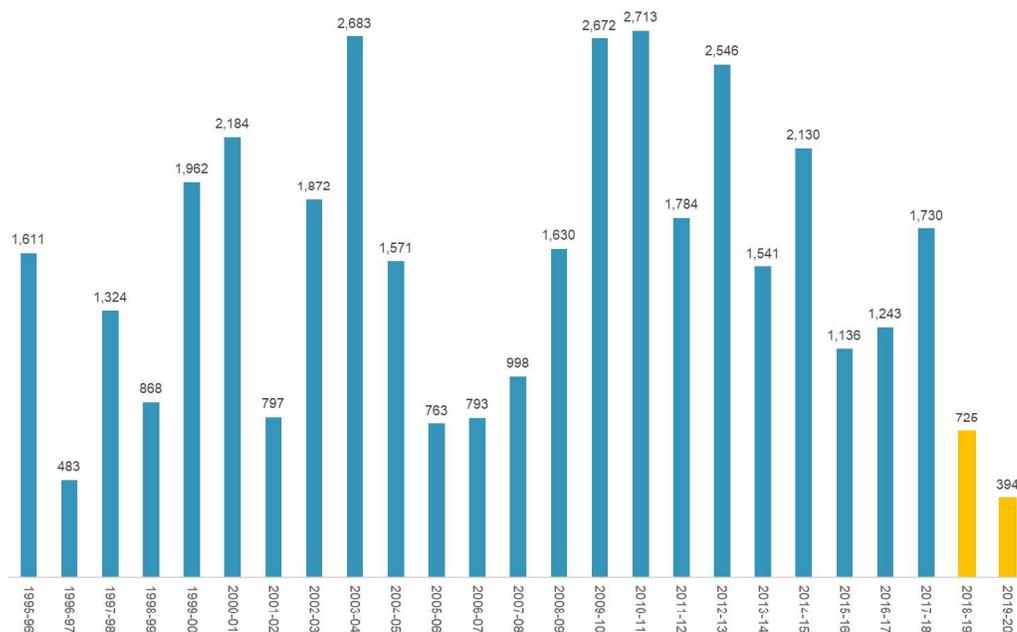
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates-for-the-uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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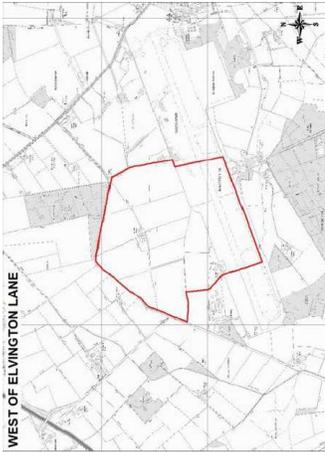
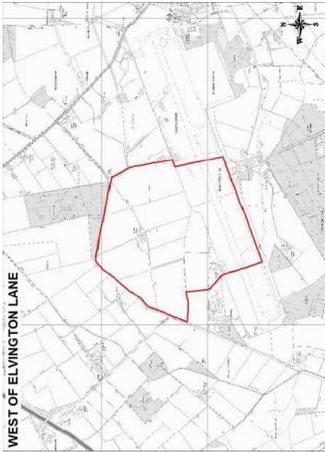




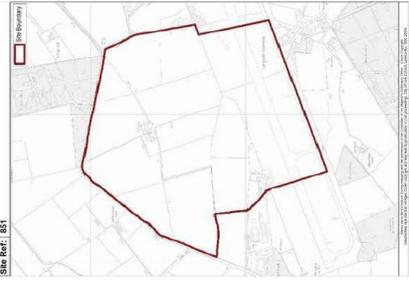
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

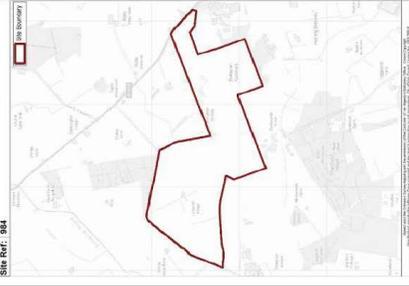
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping: Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping: Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>				
<p><b>Spatial Strategy</b></p>				
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>		<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>		

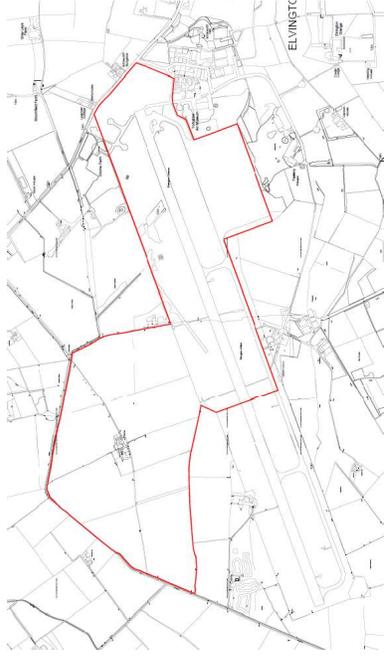
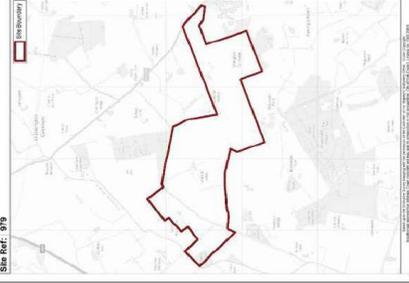
• Allocation – Site 851  
Site Ref: 851



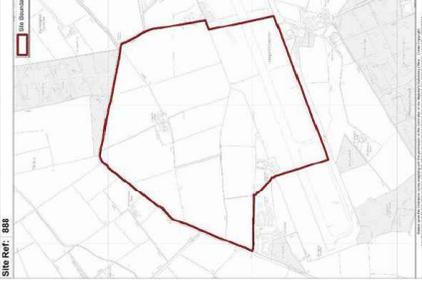
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



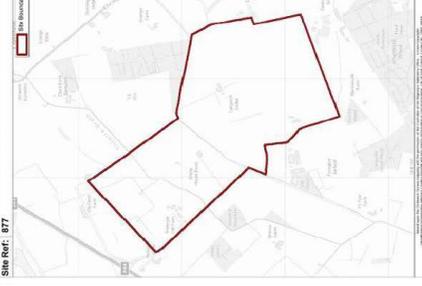
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



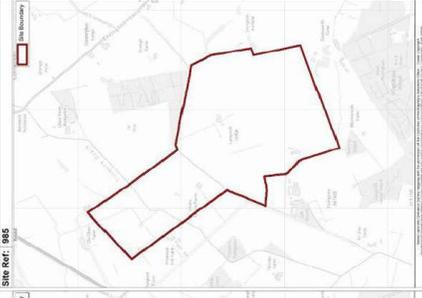
• Ait 3 Site 888 (Developer)  
Site Ref: 888



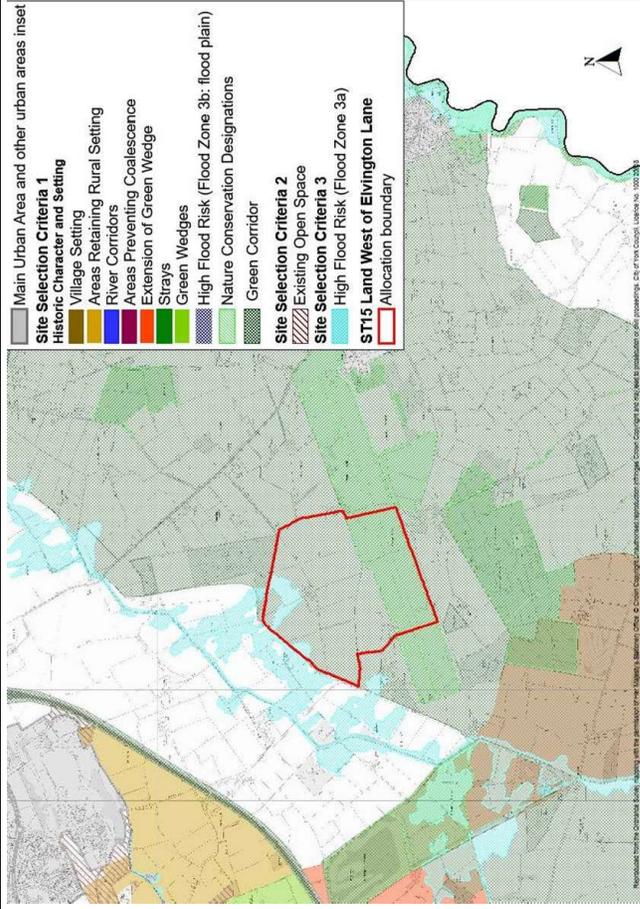
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes			3.1	Yes	
	3.2	No			3.2	No	

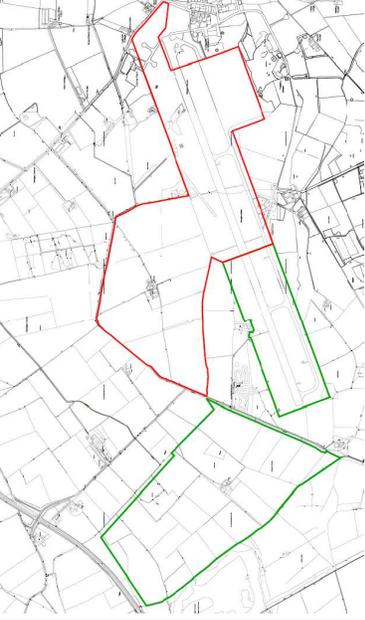
Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes			3.1	Yes	
	3.2	No			3.2	No	

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



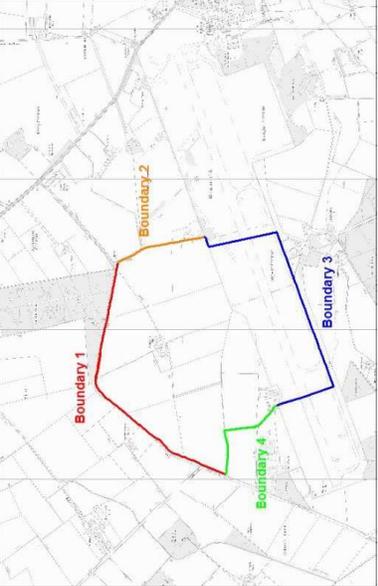
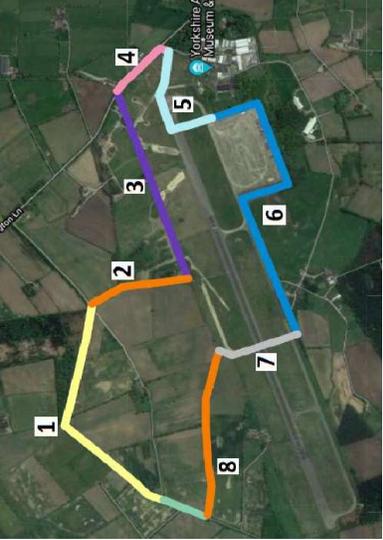
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Document Ref	Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>	

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>ST15</b>		
<b>Langwith</b>		
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical features as well as current built and natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>		<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



## Quod

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**From:** [REDACTED]  
**Sent:** 07 July 2021 15:55  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206047  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Audit Trail of Sites 35 to 100 Hectares (EX/CYC/37)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan’s evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

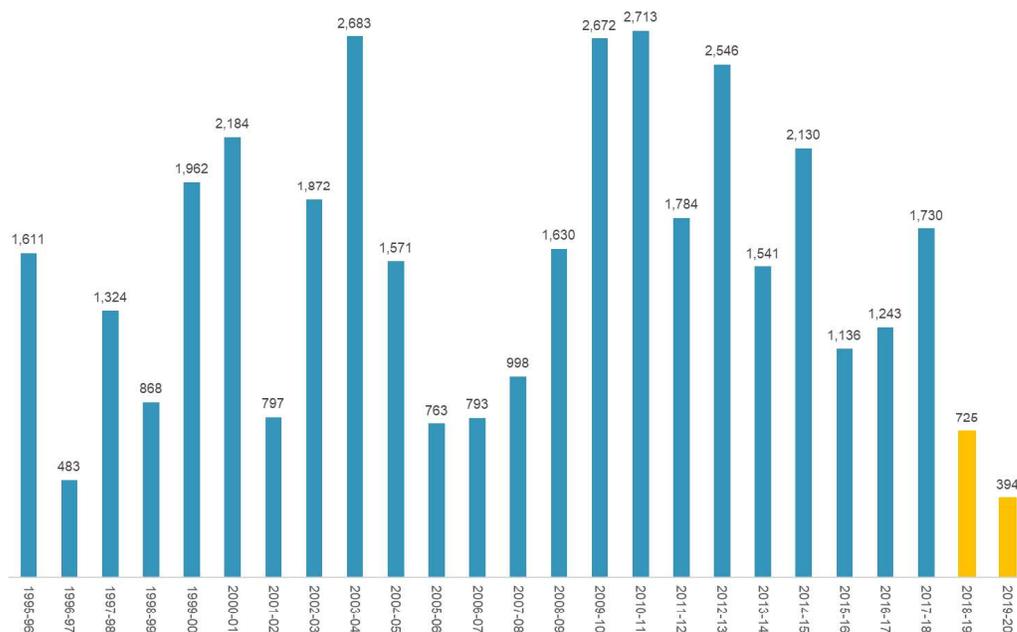
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates-for-the-uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York in now negative, that is more births than deaths.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York’s economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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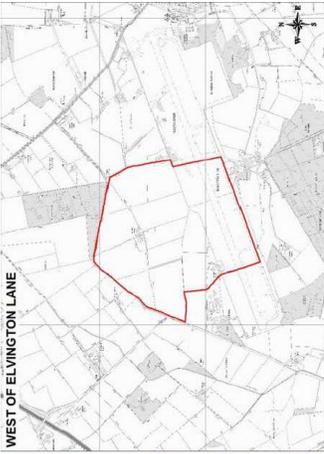
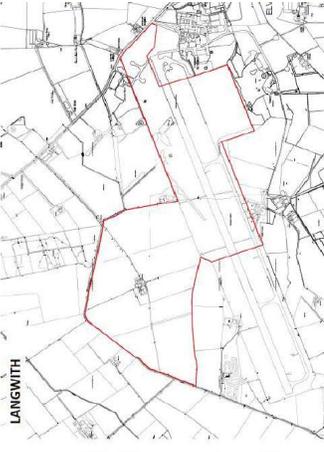




## Appendix 4

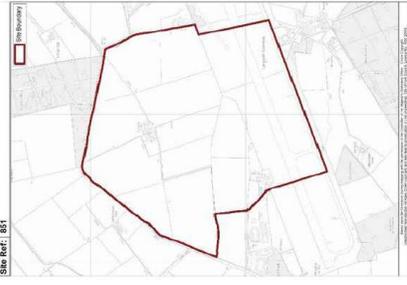
### LDP's Green Belt Assessment (update) for Langwith

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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>				
<p><b>Spatial Strategy</b></p>				
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p> <p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>				

• Allocation – Site 851

Site Ref: 851



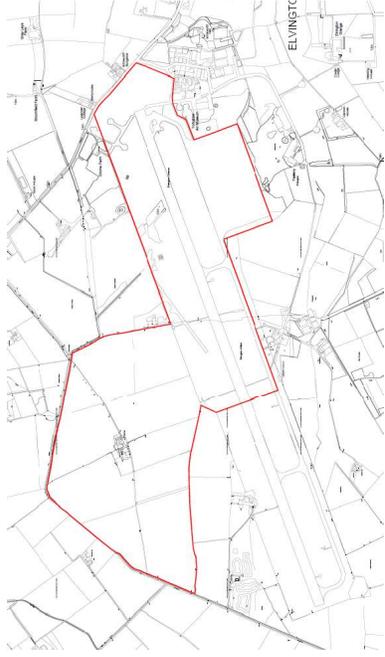
• Alternative 1 site 984 (Post PPC)

Site Ref: 884



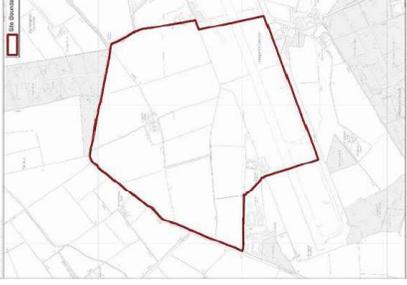
• Alternative 2 Site 975 (Developer PPC)

Site Ref: 879



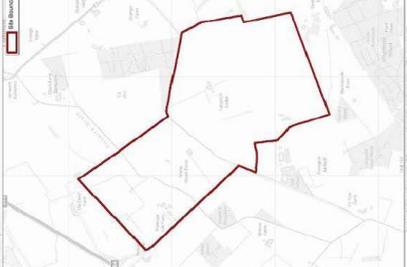
• Alt 3 Site 888 (Developer)

Site Ref: 888

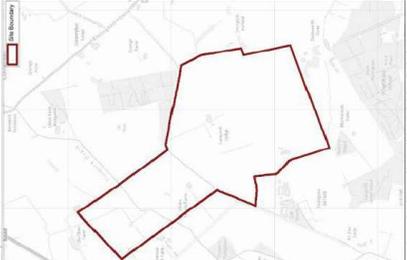


• Alt 4 site 877 / 985

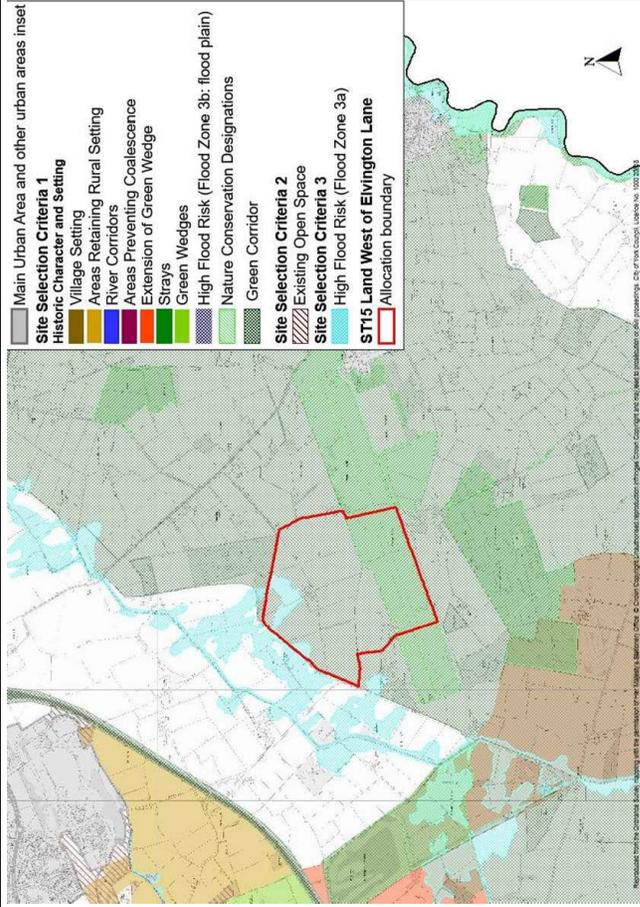
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy.**

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy.**

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

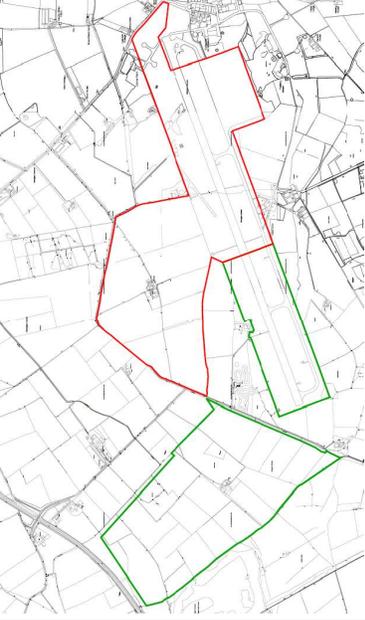
Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



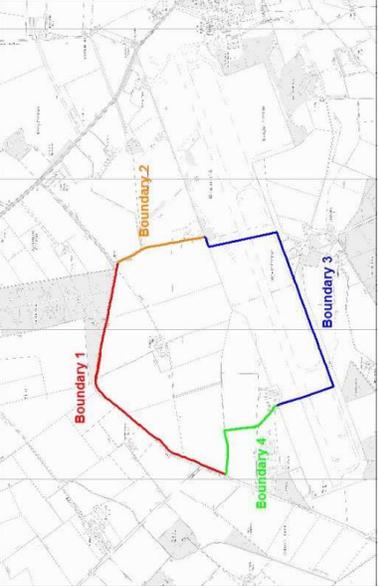
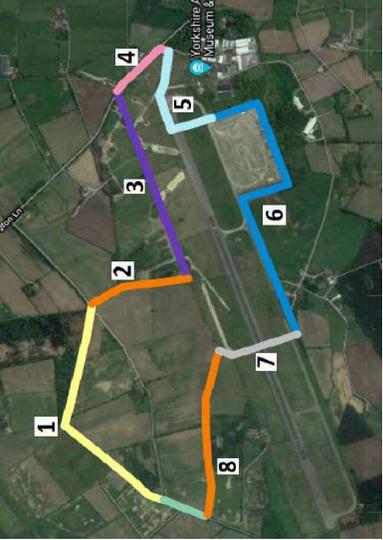
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Document Ref</b></p> <ul style="list-style-type: none"> <li>• SA main report (2018)</li> <li>• [CD008] Strategic Sites, page 116.</li> <li>• SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>• [CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>• SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>ST15</b>		
<b>Langwith</b>		
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation. The eastern extent is bound by Elvington Lane. The southern boundary follows the extent of Elvington Airfield. The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation. The eastern extent is bound by Elvington Lane. The southern boundary follows the extent of Elvington Airfield. The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical features as well as current built and natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>		<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to the reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

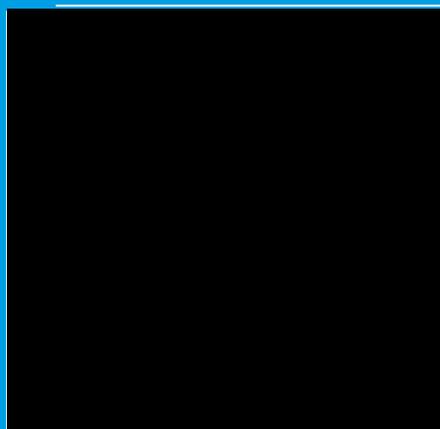
Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 15:59  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206050  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Housing Needs Update September 2020 (EX/CYC/43a)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

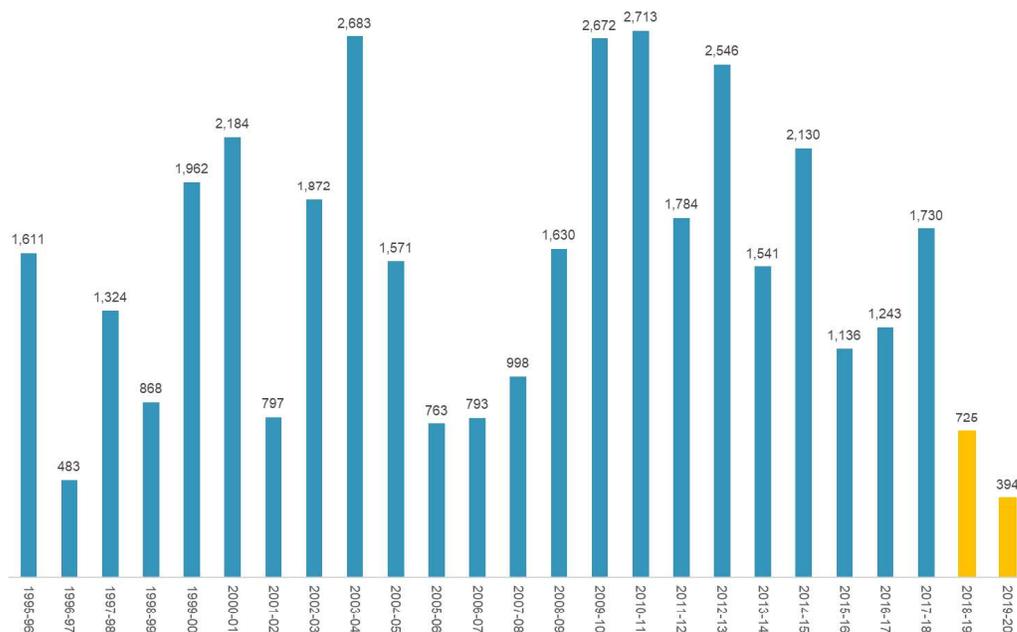
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/populationestimatesfortheuk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

Figure 7 Private Rental levels

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 /£8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

Figure 8 Affordable Homes Delivery <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

“Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018”

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher “York” growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.

99. Section 6 (page 21) introduces the results for the Reprofiled Sectoral Growth scenario.

“Our detailed assumptions are as follows:

- 20% higher growth than the baseline projections within professional services, financial & insurance, and information & communication
- 10% lower growth than the baseline projections within wholesale & retail trade and accommodation & food services”

100. The 20% growth would seem to be linked, although it is not directly stated, with the York Central development. There is not a justification or explanation given for why there is lower growth in wholesale, retail and accommodation and food services specific to York.

101. If these were national trend there is no discussion of why this is relevant to York. Indeed, the latest available national data, show a decline in financial employment and increases in food and accommodation. York has seen a greater increase in food and accommodation business from 2009 – 2019 than the UK and England, and this sector is over represented, that is has a greater share than England and the UK.

102. Both food and accommodation and retail are key components of the York offer to visitors and tourists, as well as a large city with a rural hinterland. It does not seem credible without reasoned evidence to model this reduction.

103. If the reprofiled scenario (with these two specific changes to the updated baseline) are a means to model the York Central impact it should be showing the impact of this, as the Council state<sup>24</sup>:

“It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%. York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK”.

This would need to be read as over and above any prevailing growth trends.

104. The key outputs from EX/CYC/29 are recreated for reference below.

<b>GVA</b>				
	2017	2038	Change	%
<b>Baseline National</b>	5309	6929	1620	30.5
<b>Reprofiled</b>	5309	7030	1721	32.4

Data from

- Fig 3 2017 GVA
- Fig 15 2038 GVA and % Increase
- Change in £ Calculated for this report

<b>Employment</b>					
	2017	2038	Change	%	Annual
<b>Baseline National</b>	119531	129062	9531	7.97	454
<b>Reprofiled</b>	119531	130311	10780	9.02	513

Data from or calculated from Fig 16

<sup>24</sup> <http://www.yorkcentral.info/>

105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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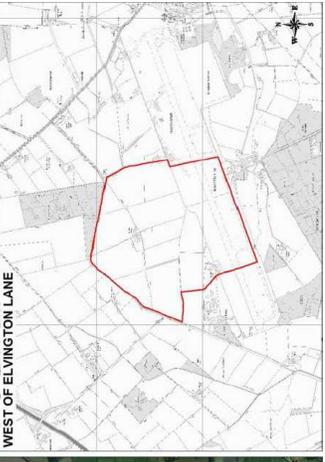
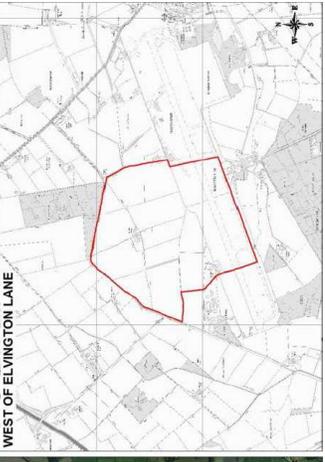




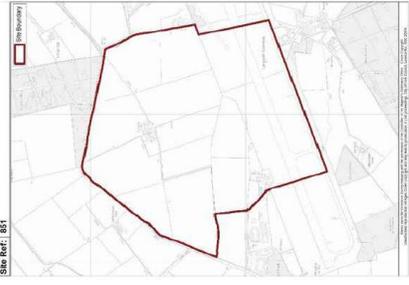
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

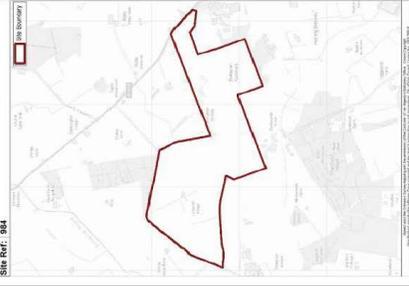
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>				
<p><b>Spatial Strategy</b></p>				
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>		<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>		

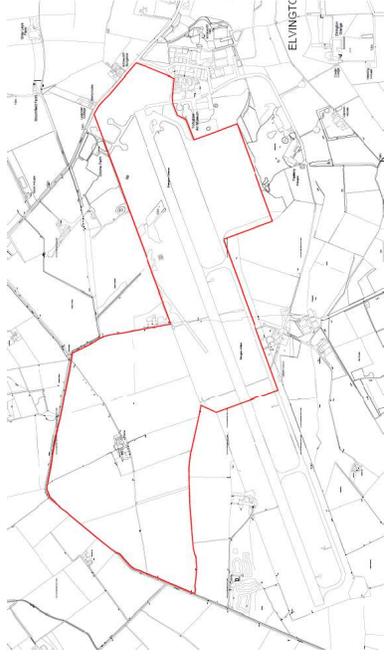
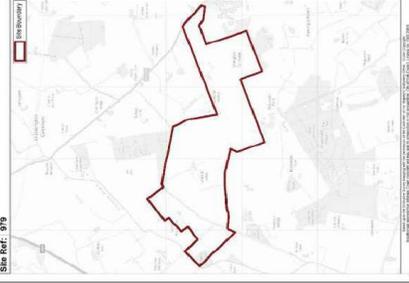
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Site Ref: 851



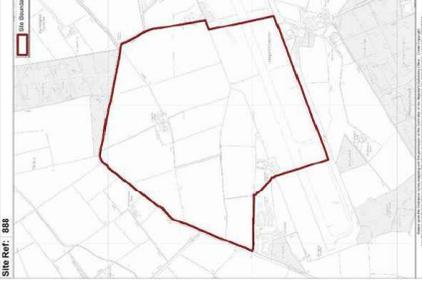
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



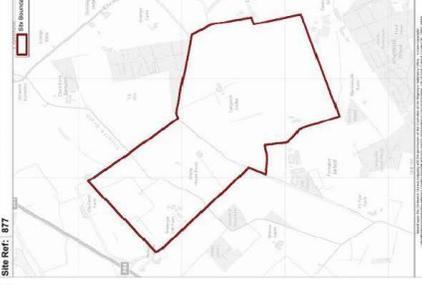
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



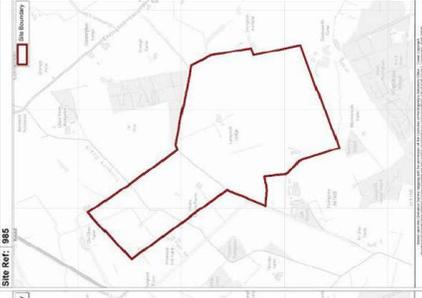
• Alt 3 Site 888 (Developer)  
Site Ref: 888



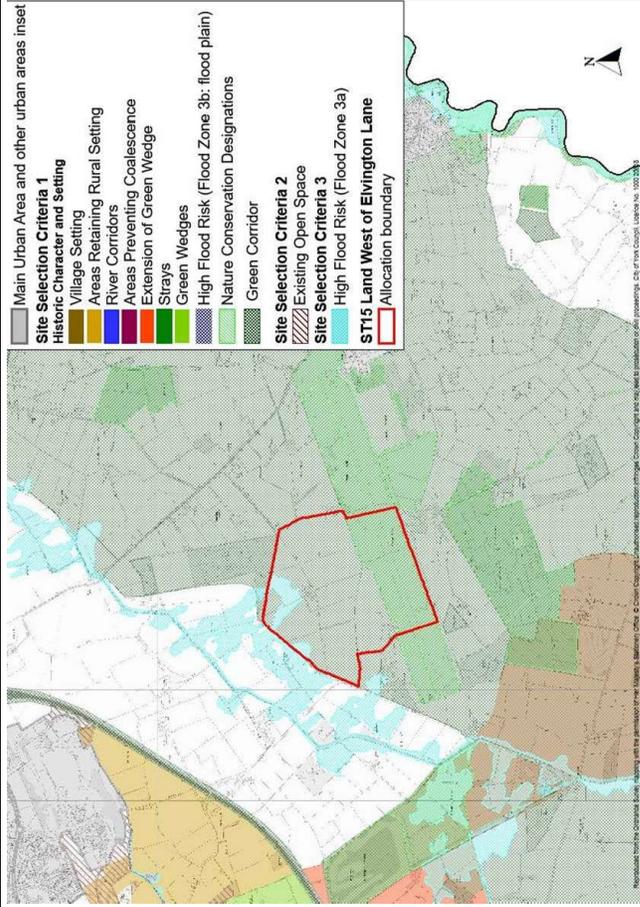
• Alt 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalones settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes		4.2	No	
	1.3	No		4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalones settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes		5.2	Yes	
	2.3	No		5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes	Purpose 4 – Spatial distribution to include standalones settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalones settlements helps to avoid any significant harm by reason of encroachment overall.
	3.2	No				

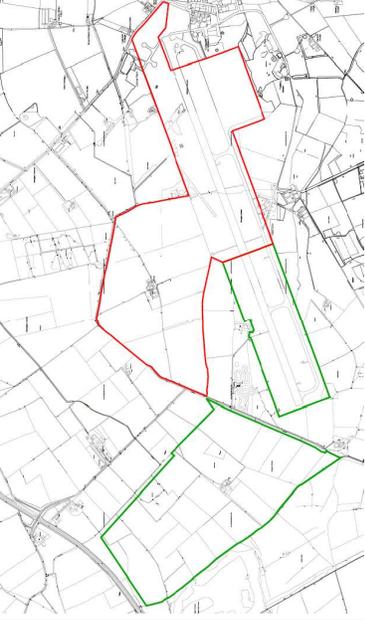
Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalones settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes		4.2	No	
	1.3	No		4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalones settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes		5.2	Yes	
	2.3	No		5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes	Purpose 4 – Spatial distribution to include standalones settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise. <td rowspan="3">5.1</td> <td rowspan="3">Yes</td> <td rowspan="3">Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalones settlements helps to avoid any significant harm by reason of encroachment overall.</td>	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalones settlements helps to avoid any significant harm by reason of encroachment overall.
	3.2	No				

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith will result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



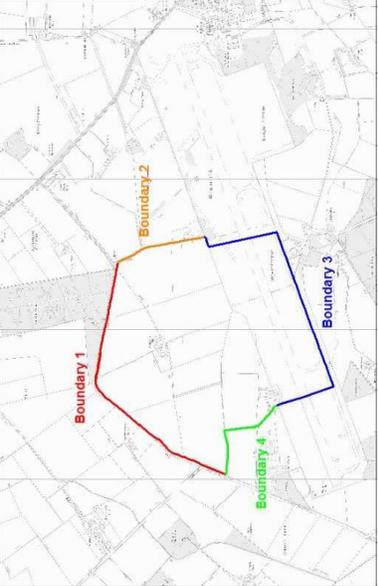
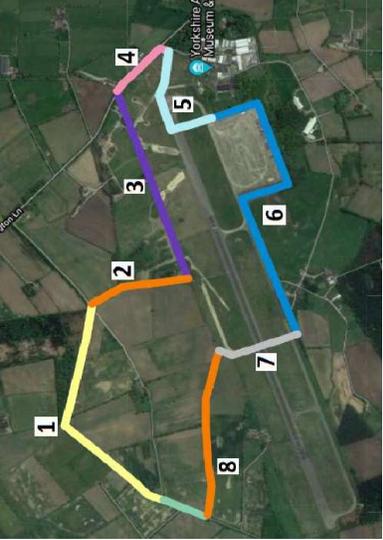
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Document Ref</b></p> <ul style="list-style-type: none"> <li>• SA main report (2018)</li> <li>• [CD008] Strategic Sites, page 116.</li> <li>• SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>• [CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>• SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
<p><b>ST15</b></p> <p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.</p> <p>(ii) Must form an identifiable, compact self-sustaining settlement.</p> <p>(iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.</p> <p>(iv) Must respect historic recreational routes.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation. The eastern extent is bound by Elvington Lane. The southern boundary follows the extent of Elvington Airfield. The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>			

<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 16:03  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206051  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Habitats Regulations Assessment 2020 (EX/CYC/45) and Habitats Regulations Assessment 2020 Appendices (EX/CYC/45a)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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Green Belt Matters	21
Sustainability (Including HRA and SFRA)	27
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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC. The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

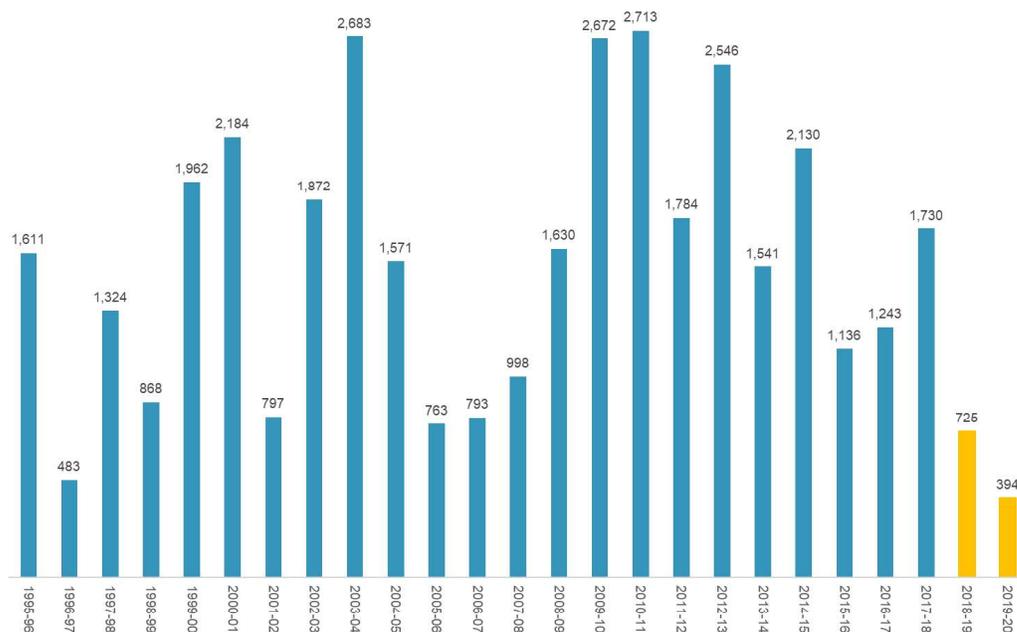
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates-for-the-uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

<b>Period Average</b>	<b>Average Employment</b>	<b>20% uplift to trend</b>	<b>Implied York Central impact on average employment</b>
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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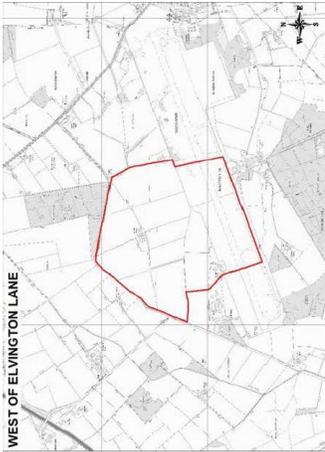




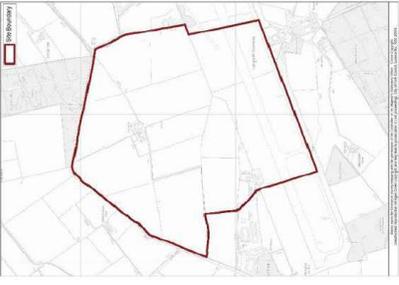
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

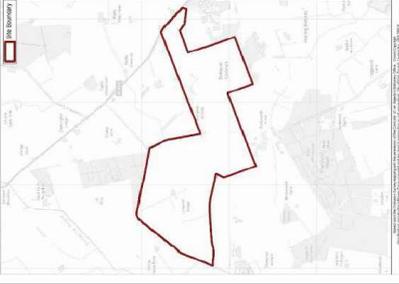
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>			
<p><b>Spatial Strategy</b></p>			
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p> <p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>			

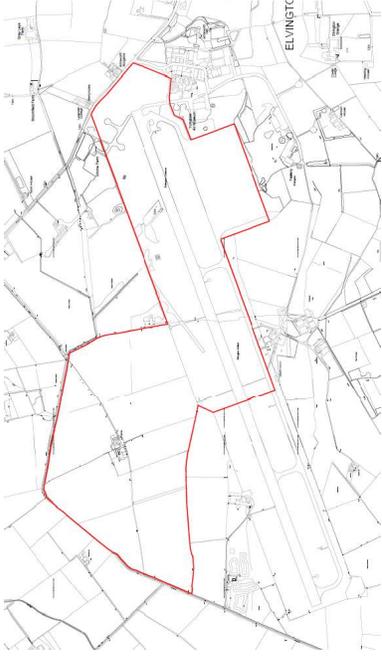
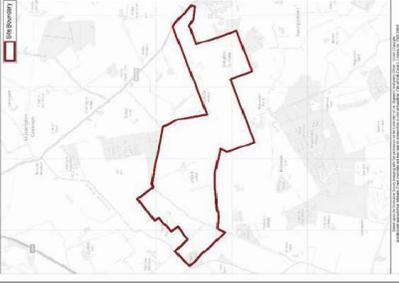
• Allocation – Site 851  
Site Ref: 851



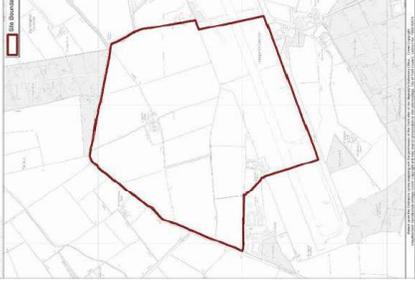
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



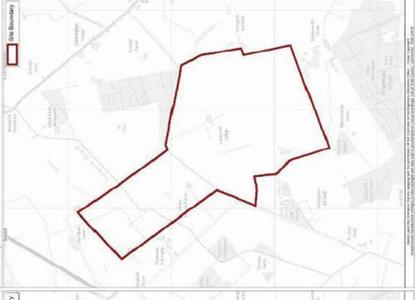
• Ait 3 Site 888 (Developer)  
Site Ref: 888



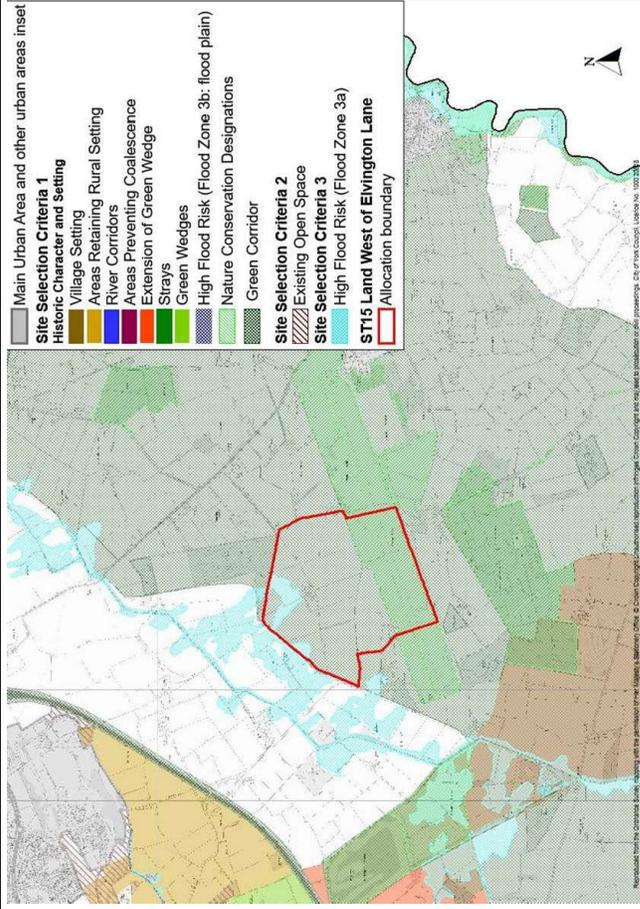
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severalextrajunctions / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severalextrajunctions / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl			Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Purpose 3 – Encroachment distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.	
	1.2	Yes	4.1	Yes	4.2			No
	1.3	No	4.3	No	4.3			No
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment			Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.		
	2.2	Yes	5.1	Yes	5.2		Yes	
	2.3	No	5.2	Yes	5.3		Yes	
Criterion 3: Landscape & Setting	3.1	Yes				The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.		
	3.2	No						

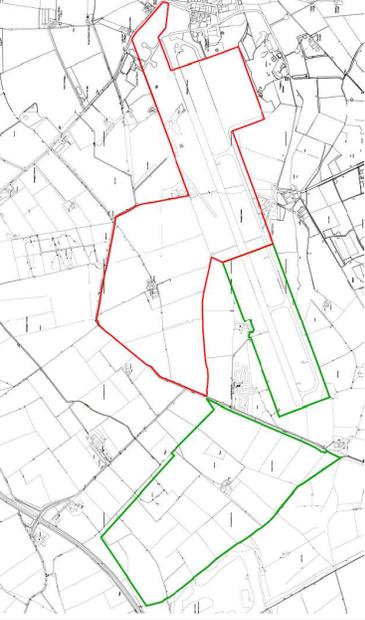
n/a

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl			Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Purpose 3 – Encroachment distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.	
	1.2	Yes	4.1	Yes	4.2			No
	1.3	No	4.3	No	4.3			No
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment			Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.		
	2.2	Yes	5.1	Yes	5.2		Yes	
	2.3	No	5.2	Yes	5.3		Yes	
Criterion 3: Landscape & Setting	3.1	Yes				The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.		
	3.2	No						

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>		<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning. Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>	



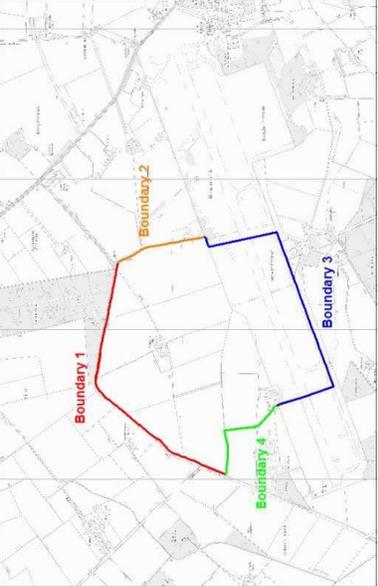
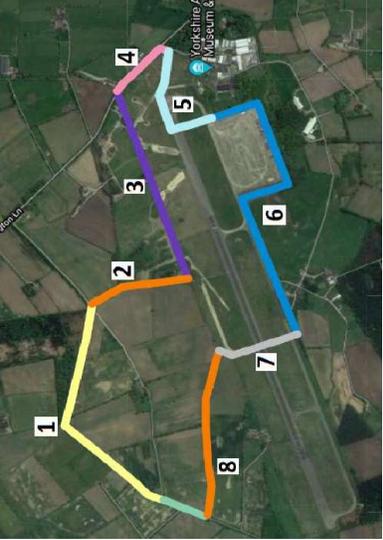
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<b>ENCROACHMENT OVERALL.</b>
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Sustainability Appraisal		Document Ref	Langwith
ST15	<p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
<b>ST15</b>	<b>Site specific boundary considerations from Green Belt Purpose analysis.</b>	<b>Proposed boundary description and recognisability</b>
	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.</p> <p>(ii) Must form an identifiable, compact self-sustaining settlement.</p> <p>(iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.</p> <p>(iv) Must respect historic recreational routes.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 16:07  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206053  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Strategic Housing Land Availability Assessment Update (April 2021) (EX/CYC/56)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

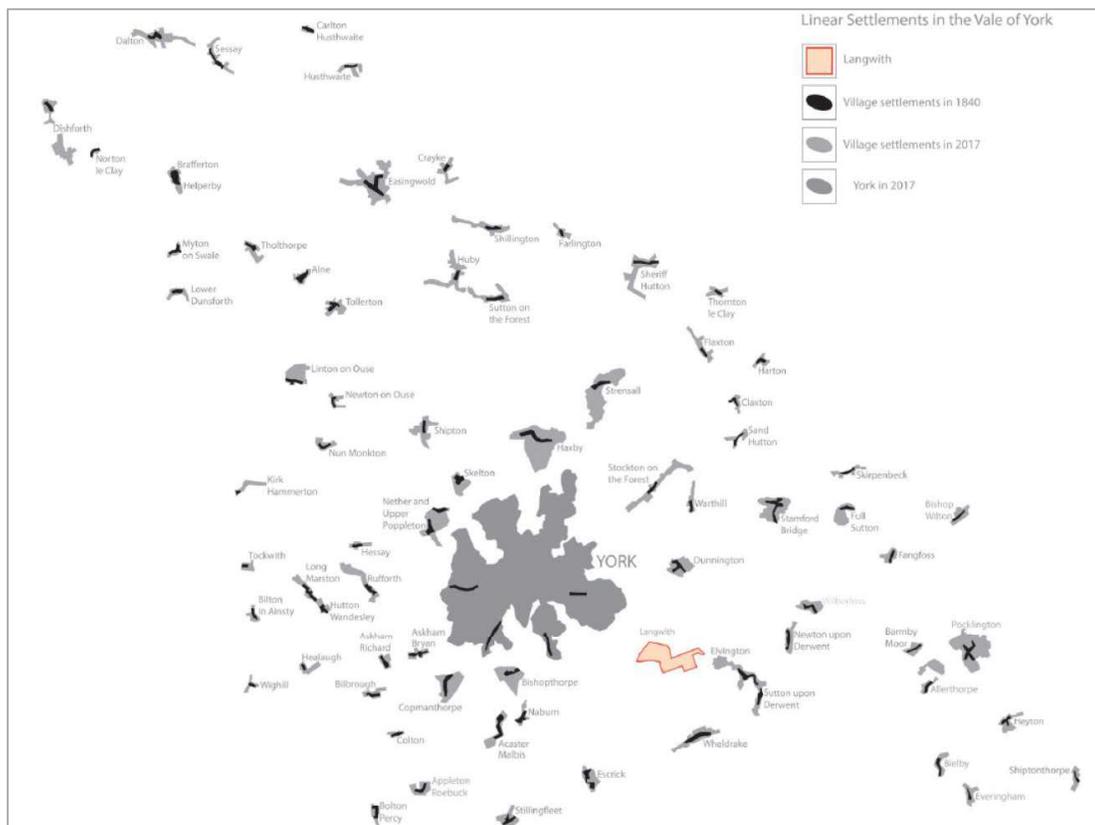
- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.

Figure 4.1: Linear Settlements of the Vale of York



- 4.17 Consequently, it is LDP’s view that the application of “compactness” as one of the tests for determining Green Belt boundaries for allocations should be applied differently to that of the main urban area of York. That is to say, it is not necessary for new freestanding settlements to be drawn up as a concentric form, and in fact as such that would be uncharacteristic of the settlements which surround York, which are linear.
- 4.18 Compactness does not necessarily mean a largely concentric form of development but, more so, a form that is self-contained. It is demonstrated in the previous Representations by LDP [EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) that Langwith can be carefully designed to provide strong and identifiable boundaries, which are well defined and capable of containing development in an appropriate manner without causing harm to the main purposes of York’s Green Belt.
- 4.19 It is LDP’s view that CYC’s reference to the compactness of the villages (see paragraph 8.23 of [EX/CYC/59](#) is recognising the need for them to be self-contained within a wider landscape setting, rather than in a concentric form.
- 4.20 For the reasons that have already been set out in previous evidence by LDP, and in this Report, it is important that the geographic scope of the new villages in the south east of the City need to be set in the context of setting a permanent Green Belt boundary that is capable of meeting the City’s housing needs, and that it should be set for an enduring period (i.e. at least 5 years post the plan period, (which LDP suggest should be extended 2038).

- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Introduction

Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

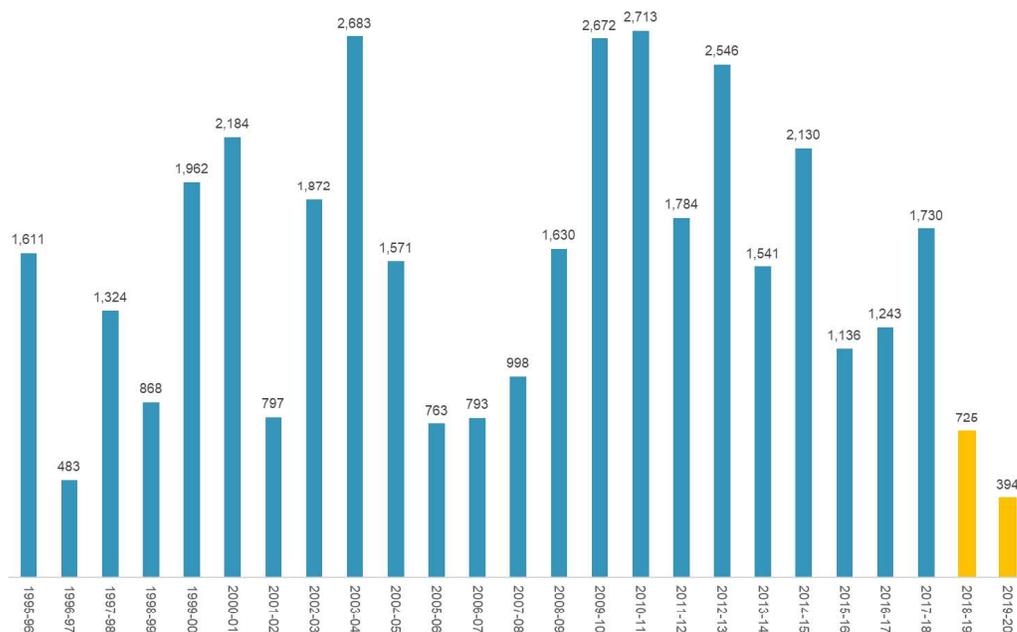
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not to discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

<b>Period Average</b>	<b>Average Employment</b>	<b>20% uplift to trend</b>	<b>Implied York Central impact on average employment</b>
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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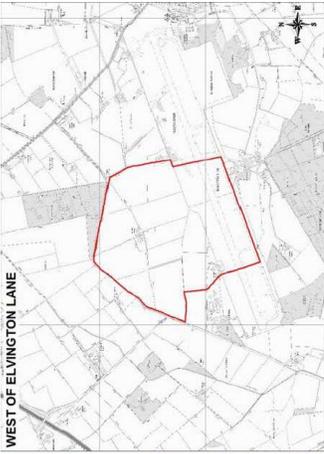
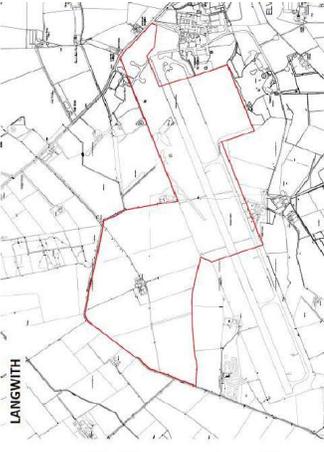




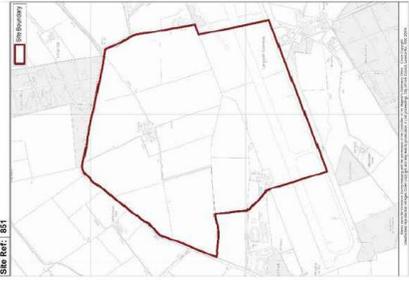
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

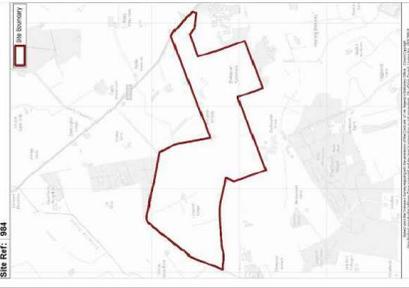
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>Langwith</b></p>		 <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>		<p><b>Spatial Strategy</b></p>	
<p><b>Land Submitted for Consideration</b></p>		<p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>	<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>

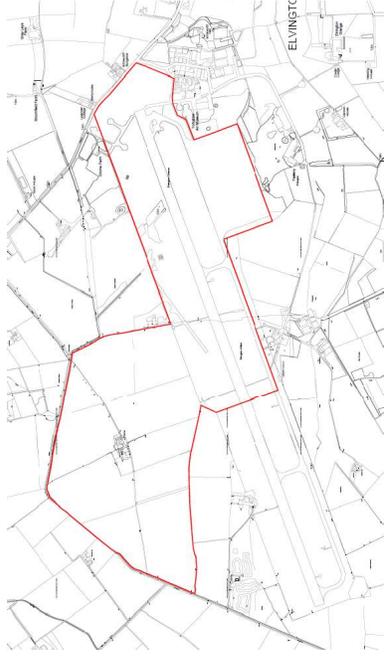
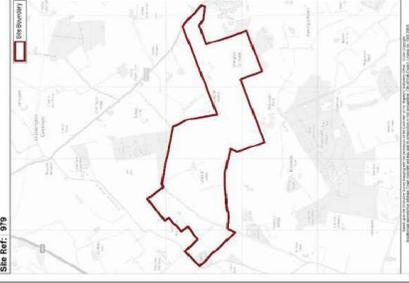
• Allocation – Site 851  
Site Ref: 851



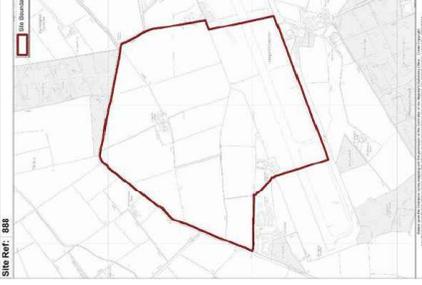
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



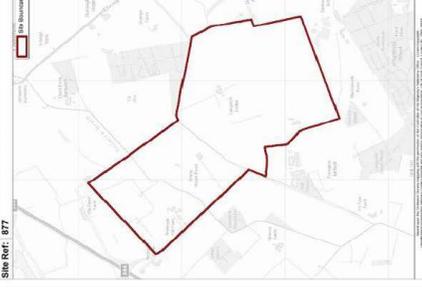
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



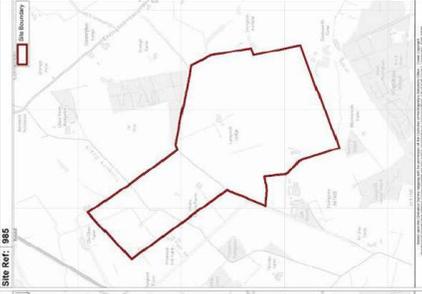
• Ait 3 Site 888 (Developer)  
Site Ref: 888



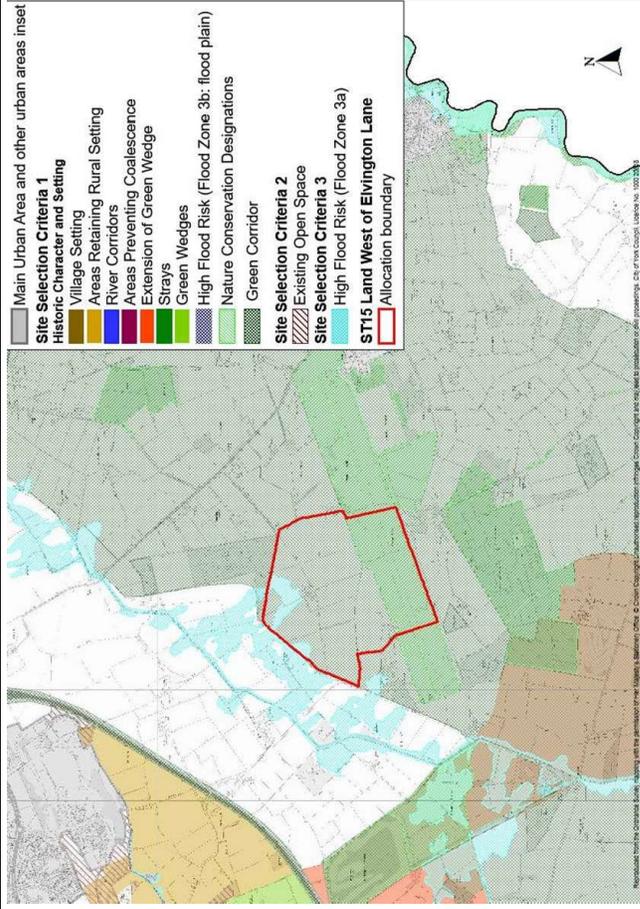
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy.**

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy.**

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

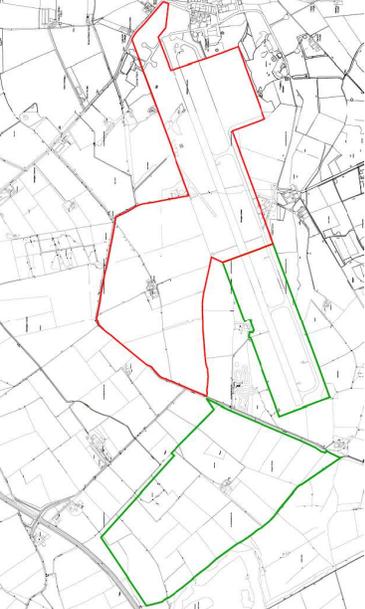
Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



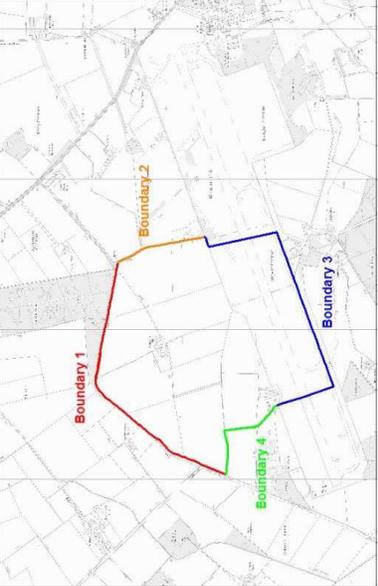
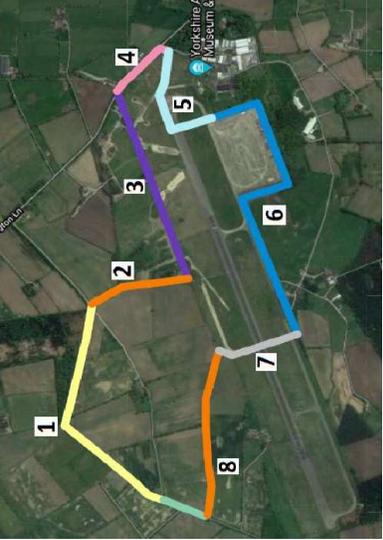
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Document Ref	Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>	

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
<p><b>ST15</b></p> <p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.</p> <p>(ii) Must form an identifiable, compact self-sustaining settlement.</p> <p>(iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.</p> <p>(iv) Must respect historic recreational routes.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation. The eastern extent is bound by Elvington Lane. The southern boundary follows the extent of Elvington Airfield. The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

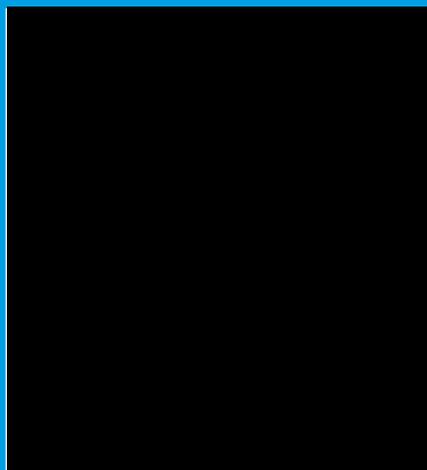
Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 16:14  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206057  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base (EX/CYC/59a)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

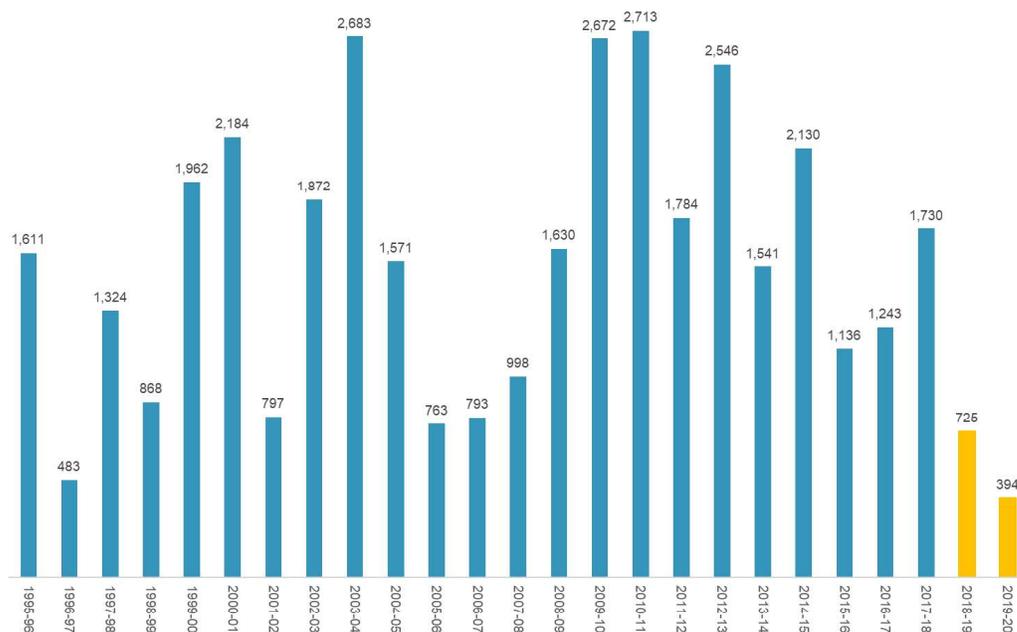
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates-for-the-uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

[Figure 5. Age Changes](#)

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not to discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York’s economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.

99. Section 6 (page 21) introduces the results for the Reprofiled Sectoral Growth scenario.

“Our detailed assumptions are as follows:

- 20% higher growth than the baseline projections within professional services, financial & insurance, and information & communication
- 10% lower growth than the baseline projections within wholesale & retail trade and accommodation & food services”

100. The 20% growth would seem to be linked, although it is not directly stated, with the York Central development. There is not a justification or explanation given for why there is lower growth in wholesale, retail and accommodation and food services specific to York.

101. If these were national trend there is no discussion of why this is relevant to York. Indeed, the latest available national data, show a decline in financial employment and increases in food and accommodation. York has seen a greater increase in food and accommodation business from 2009 – 2019 than the UK and England, and this sector is over represented, that is has a greater share than England and the UK.

102. Both food and accommodation and retail are key components of the York offer to visitors and tourists, as well as a large city with a rural hinterland. It does not seem credible without reasoned evidence to model this reduction.

103. If the reprofiled scenario (with these two specific changes to the updated baseline) are a means to model the York Central impact it should be showing the impact of this, as the Council state<sup>24</sup>:

“It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK”.

This would need to be read as over and above any prevailing growth trends.

104. The key outputs from EX/CYC/29 are recreated for reference below.

<b>GVA</b>				
	2017	2038	Change	%
<b>Baseline National</b>	5309	6929	1620	30.5
<b>Reprofiled</b>	5309	7030	1721	32.4

Data from

- Fig 3 2017 GVA
- Fig 15 2038 GVA and % Increase
- Change in £ Calculated for this report

<b>Employment</b>					
	2017	2038	Change	%	Annual
<b>Baseline National</b>	119531	129062	9531	7.97	454
<b>Reprofiled</b>	119531	130311	10780	9.02	513

Data from or calculated from Fig 16

<sup>24</sup> <http://www.yorkcentral.info/>

105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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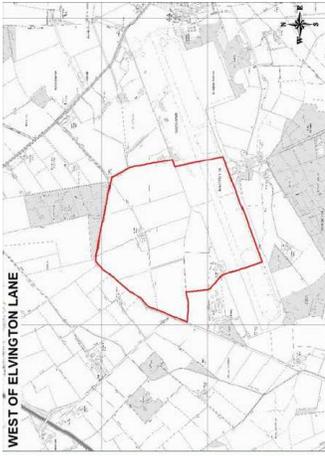
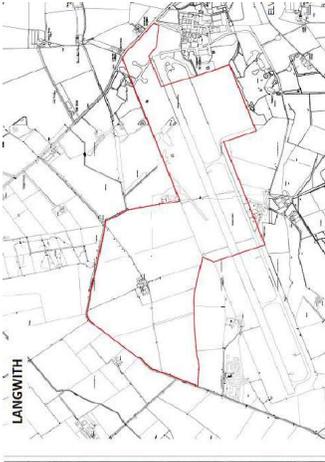




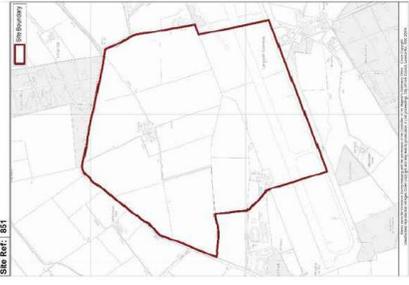
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

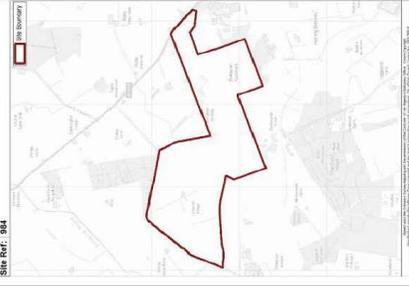
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<p><b>ST15</b></p>	 	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>   <p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>		<p><b>Spatial Strategy</b></p> <p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p> <p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>	

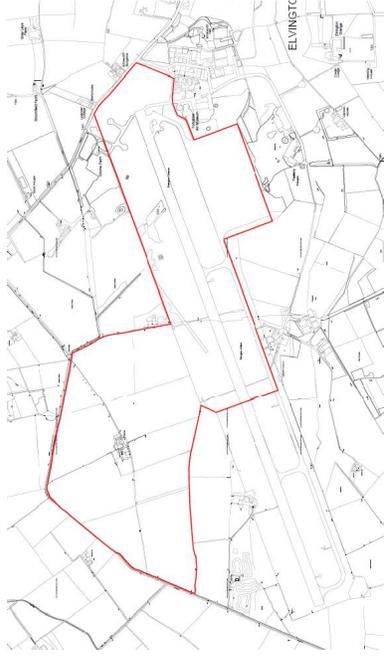
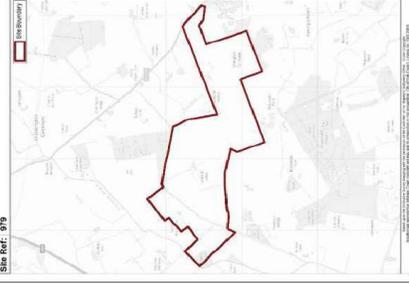
• Allocation – Site 851  
Site Ref: 851



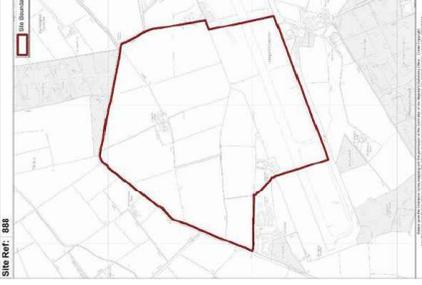
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



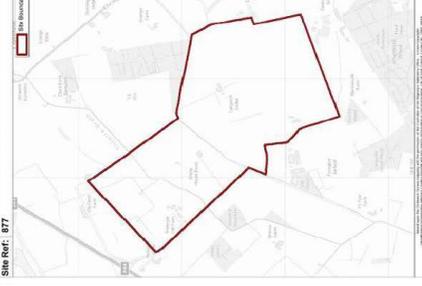
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



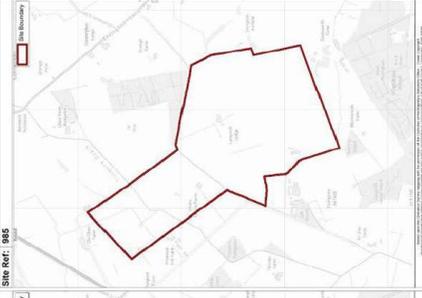
• Ait 3 Site 888 (Developer)  
Site Ref: 888



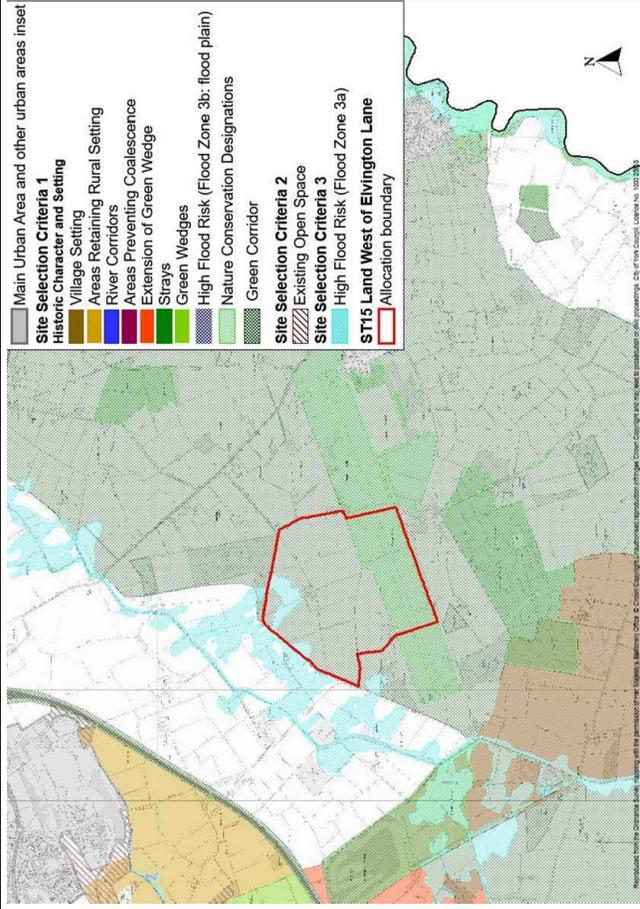
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy.**

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy.**

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>		<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning. Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>	



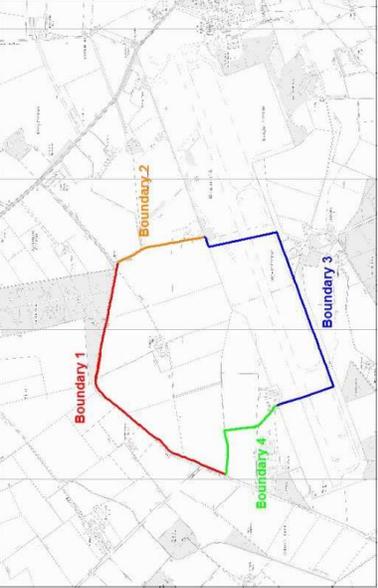
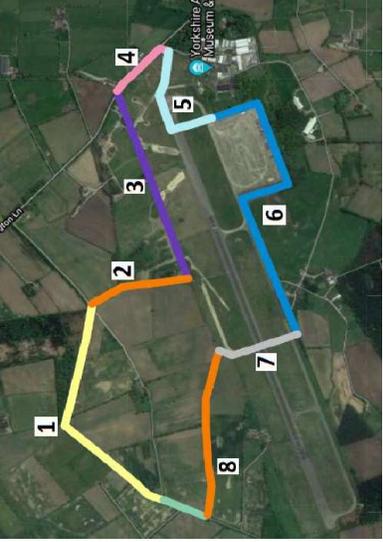
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>	<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p> 	<p><b>ENCROACHMENT OVERALL.</b></p>
	<p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	

Sustainability Appraisal	
ST15	Document Ref
<p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Langwith</b></p> <p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p> <ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>ST15</b>		
<b>Langwith</b>		
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation. The eastern extent is bound by Elvington Lane. The southern boundary follows the extent of Elvington Airfield. The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>			

<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to the reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

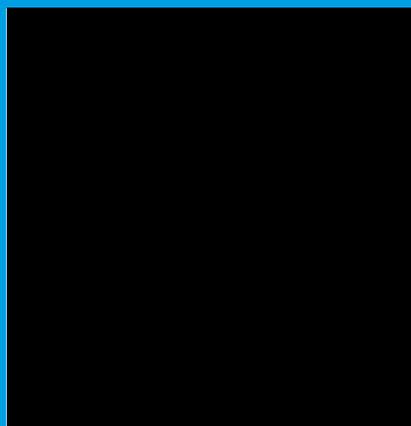
Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 16:17  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206060  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]  
[REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites (EX/CYC/59g)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

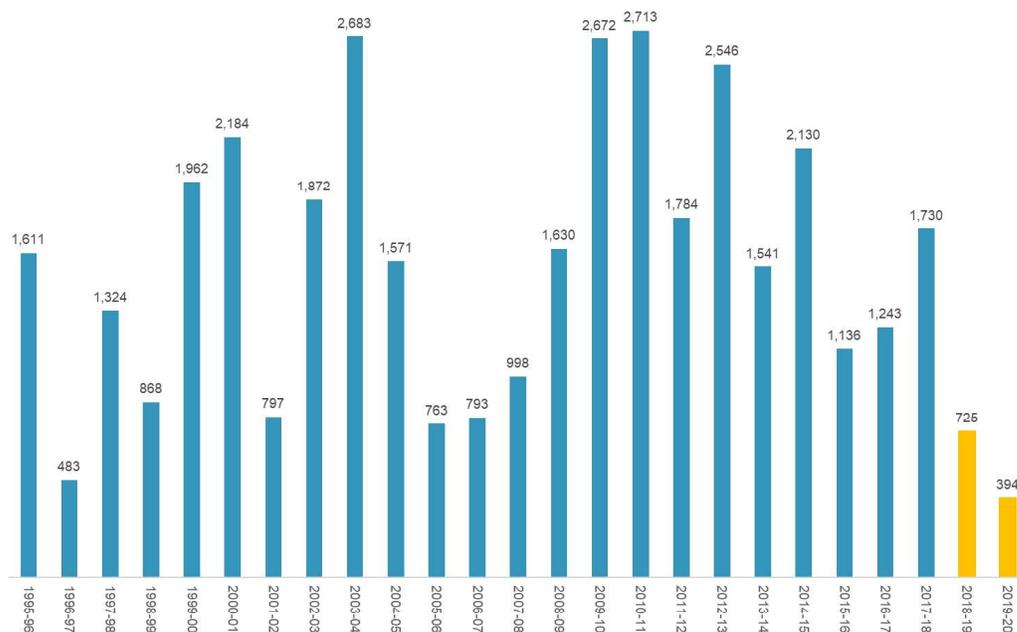
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates-for-the-uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

<b>Period Average</b>	<b>Average Employment</b>	<b>20% uplift to trend</b>	<b>Implied York Central impact on average employment</b>
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.

99. Section 6 (page 21) introduces the results for the Reprofiled Sectoral Growth scenario.

“Our detailed assumptions are as follows:

- 20% higher growth than the baseline projections within professional services, financial & insurance, and information & communication
- 10% lower growth than the baseline projections within wholesale & retail trade and accommodation & food services”

100. The 20% growth would seem to be linked, although it is not directly stated, with the York Central development. There is not a justification or explanation given for why there is lower growth in wholesale, retail and accommodation and food services specific to York.

101. If these were national trend there is no discussion of why this is relevant to York. Indeed, the latest available national data, show a decline in financial employment and increases in food and accommodation. York has seen a greater increase in food and accommodation business from 2009 – 2019 than the UK and England, and this sector is over represented, that is has a greater share than England and the UK.

102. Both food and accommodation and retail are key components of the York offer to visitors and tourists, as well as a large city with a rural hinterland. It does not seem credible without reasoned evidence to model this reduction.

103. If the reprofiled scenario (with these two specific changes to the updated baseline) are a means to model the York Central impact it should be showing the impact of this, as the Council state<sup>24</sup>:

“It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%. York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK”.

This would need to be read as over and above any prevailing growth trends.

104. The key outputs from EX/CYC/29 are recreated for reference below.

<b>GVA</b>				
	2017	2038	Change	%
<b>Baseline National</b>	5309	6929	1620	30.5
<b>Reprofiled</b>	5309	7030	1721	32.4

Data from

- Fig 3 2017 GVA
- Fig 15 2038 GVA and % Increase
- Change in £ Calculated for this report

<b>Employment</b>					
	2017	2038	Change	%	Annual
<b>Baseline National</b>	119531	129062	9531	7.97	454
<b>Reprofiled</b>	119531	130311	10780	9.02	513

Data from or calculated from Fig 16

<sup>24</sup> <http://www.yorkcentral.info/>

105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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Housing Delivery Trajectories

Total Housing

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period								
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46		
	Total																										
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																										
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	103	103	103	154	154	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	250	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300

Affordable Housing Only

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period								
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46		
	Total																										
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	9	18	26	26	26	35	53	53	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																										
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	26	26	26	39	39	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	63	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	

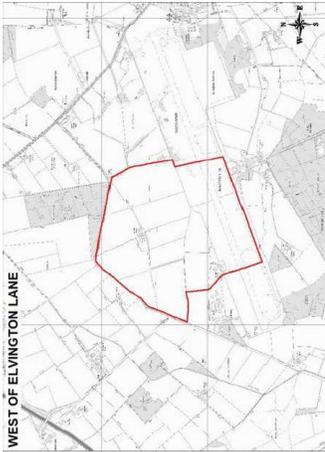
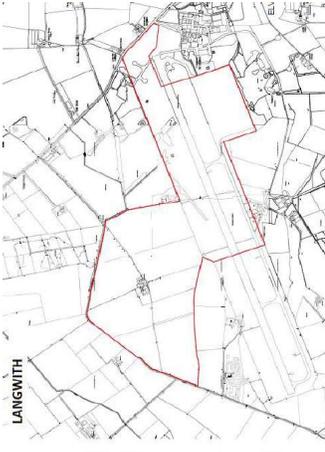
See Appendix 5 LDP's Representations to the York Local Plan PMS (June 2019) for background to above assumptions.



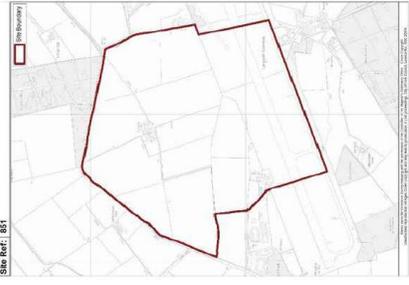
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

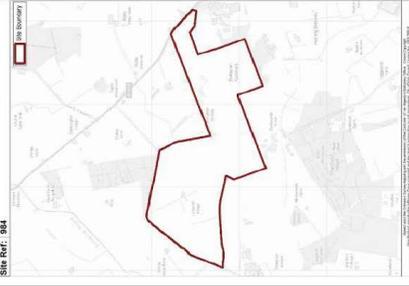
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>				
<p><b>Spatial Strategy</b></p>				
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p> <p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>				

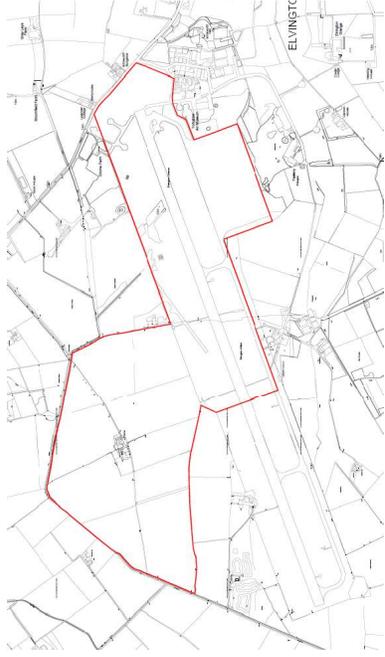
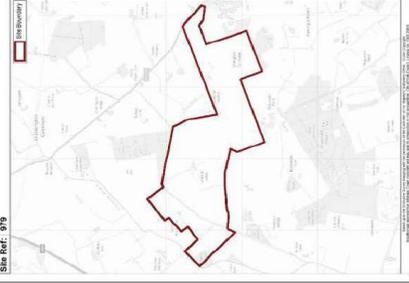
• Allocation – Site 851  
Site Ref: 851



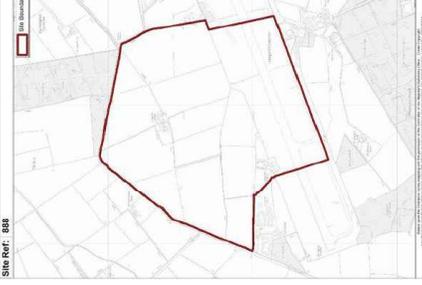
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



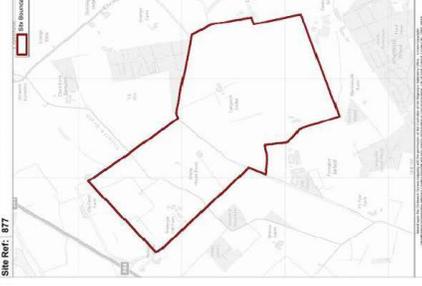
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



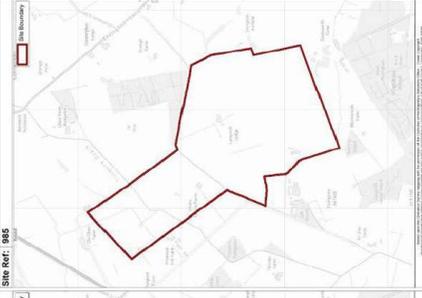
• Ait 3 Site 888 (Developer)  
Site Ref: 888



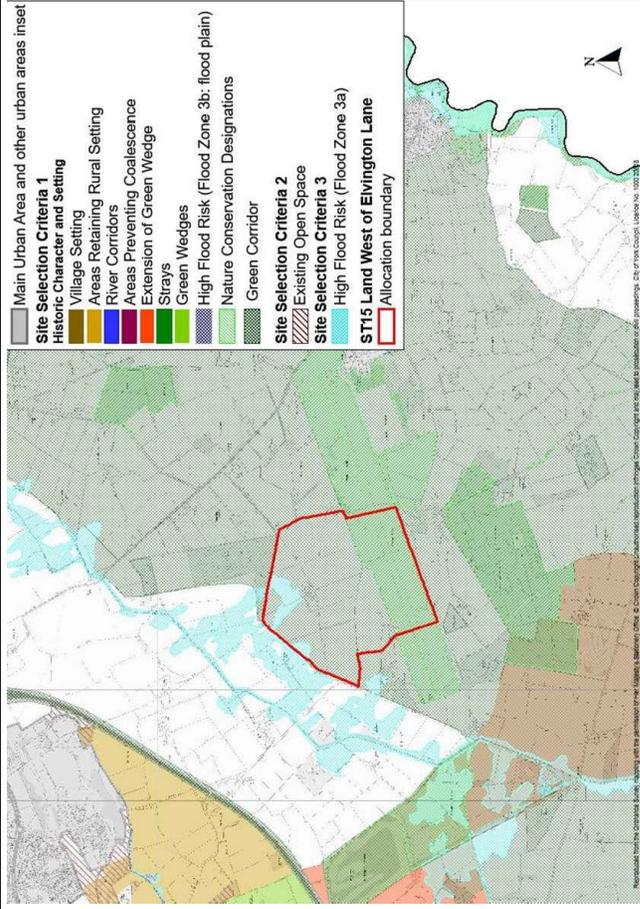
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy.**

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy.**

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes			3.1	Yes	
	3.2	No			3.2	No	

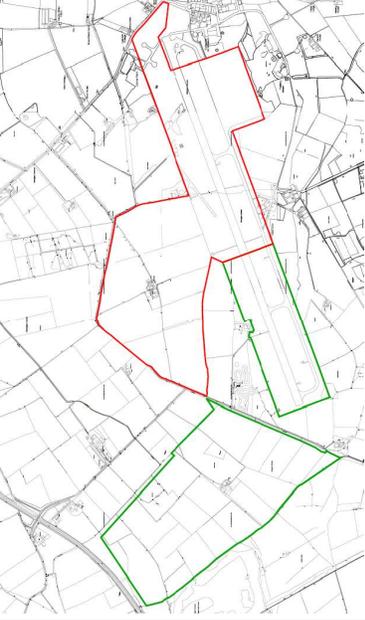
Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes			3.1	Yes	
	3.2	No			3.2	No	

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



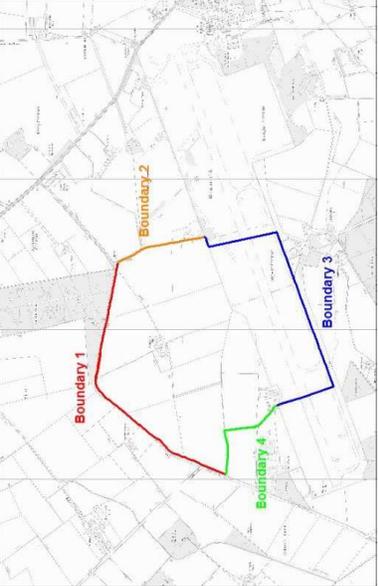
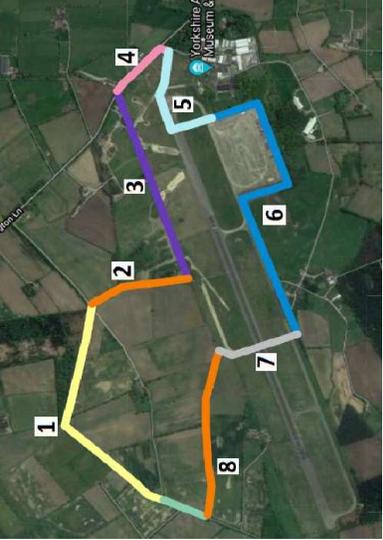
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Document Ref</b></p> <ul style="list-style-type: none"> <li>• SA main report (2018)</li> <li>• [CD008] Strategic Sites, page 116.</li> <li>• SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>• [CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>• SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
ST15	Langwith	Langwith
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>		<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



## Quod

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**From:** [REDACTED]  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206064  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update (EX/CYC/59i)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC. The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Introduction

Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

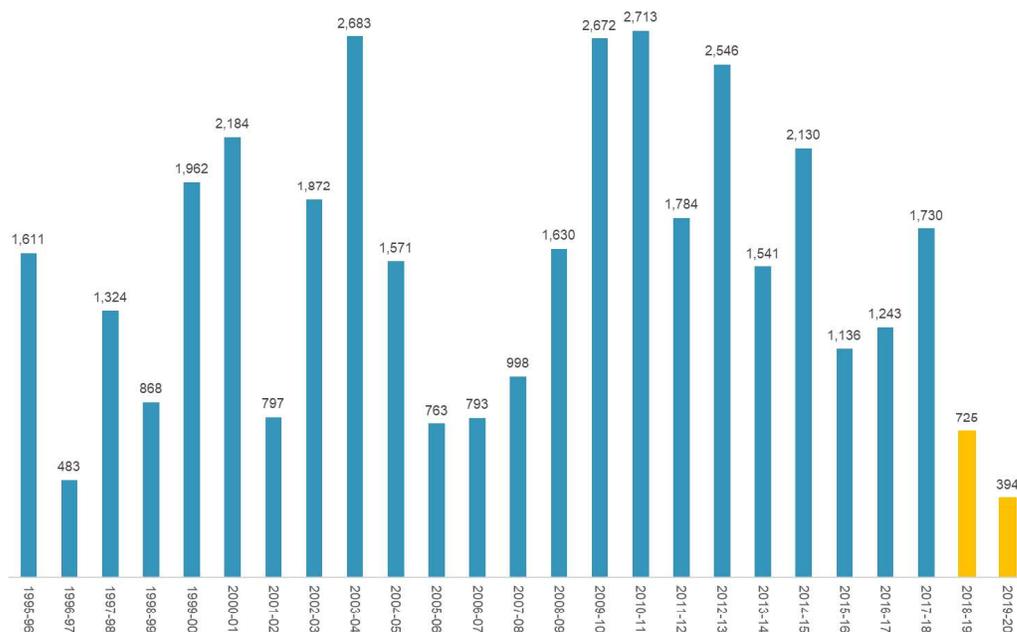
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

<b>Period Average</b>	<b>Average Employment</b>	<b>20% uplift to trend</b>	<b>Implied York Central impact on average employment</b>
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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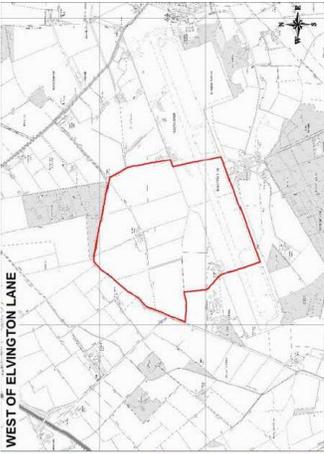
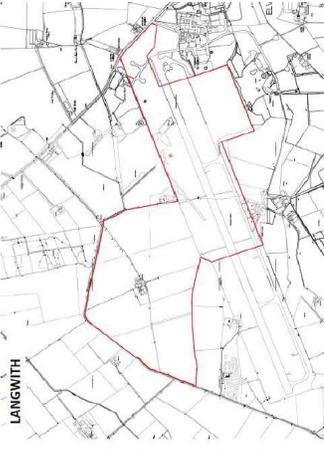




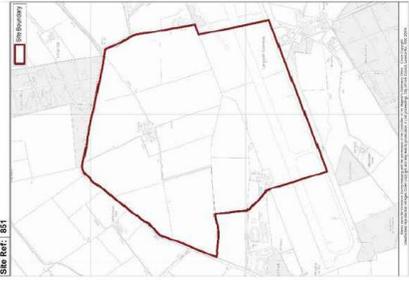
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

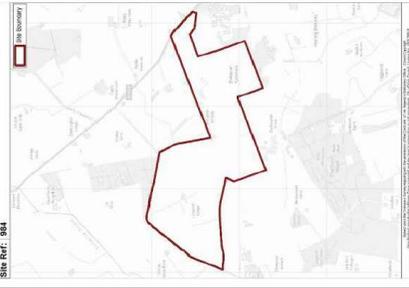
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>				
<p><b>Spatial Strategy</b></p>				
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>		<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>		

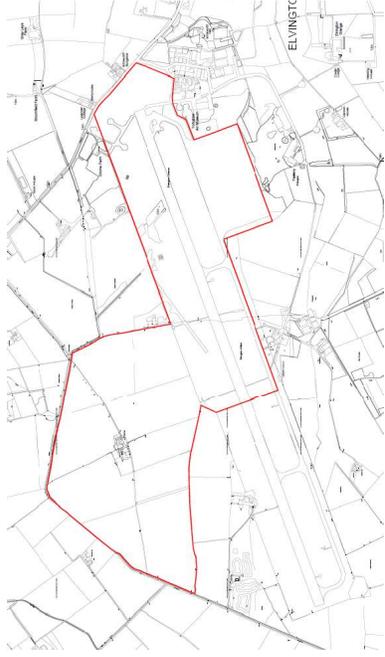
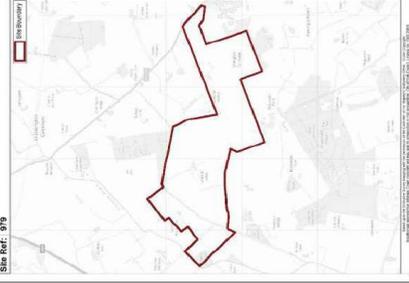
• Allocation – Site 851  
Site Ref: 851



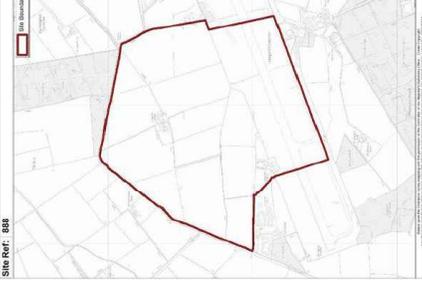
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



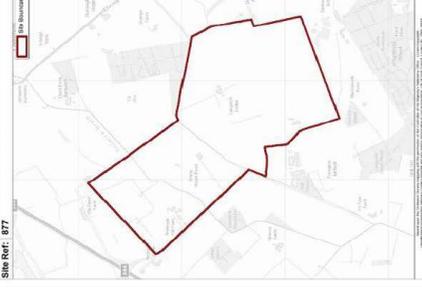
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



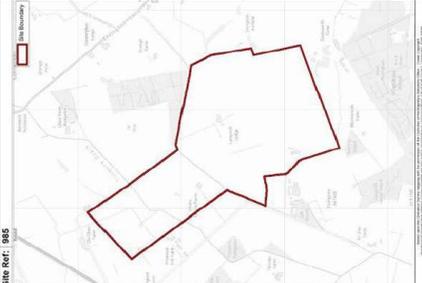
• Ait 3 Site 888 (Developer)  
Site Ref: 888



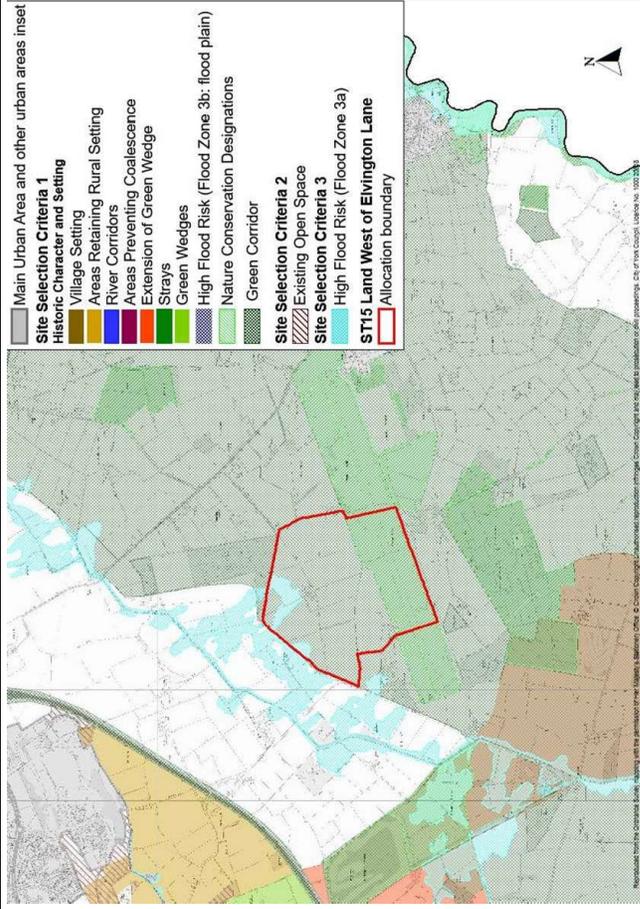
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy.**

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy.**

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



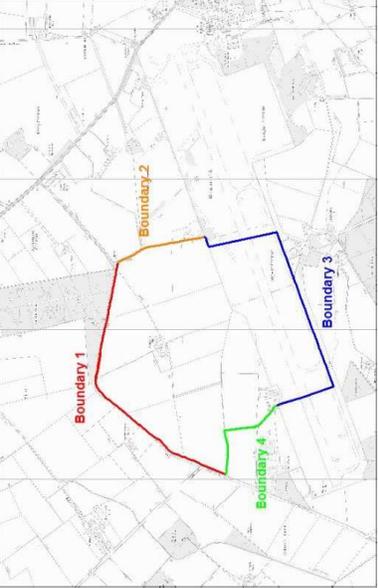
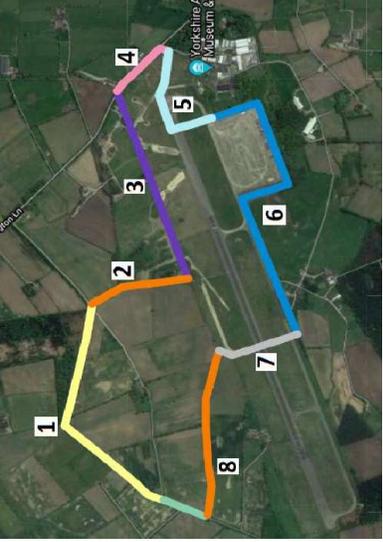
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p>

<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>	<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
	<p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	

Sustainability Appraisal	
ST15	Document Ref
<p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Langwith</b></p> <p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p> <ul style="list-style-type: none"> <li>• SA main report (2018)</li> <li>• [CD008] Strategic Sites, page 116.</li> <li>• SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>• [CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>• SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>ST15</b>		
<b>Langwith</b>		
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation. The eastern extent is bound by Elvington Lane. The southern boundary follows the extent of Elvington Airfield. The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>		<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 16:26  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206066  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]  
[REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory (EX/CYC/59j)

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**Your comments: Legal Compliance of the document**

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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# Representations to the City of York Local Plan Response to Consultation on Key Evidence and Supporting Documentation (May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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Sustainability (Including HRA and SFRA)	27
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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC. The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

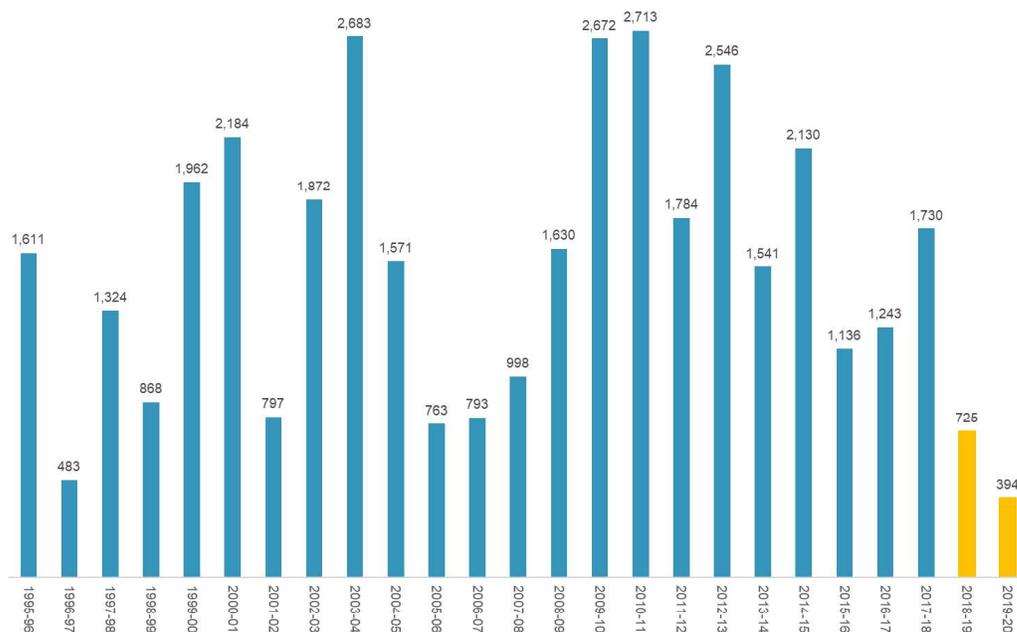
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

[Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.](#)

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

[Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-estimates-for-the-uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

[Figure 5. Age Changes](#)

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 /£8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.

99. Section 6 (page 21) introduces the results for the Reprofiled Sectoral Growth scenario.

“Our detailed assumptions are as follows:

- 20% higher growth than the baseline projections within professional services, financial & insurance, and information & communication
- 10% lower growth than the baseline projections within wholesale & retail trade and accommodation & food services”

100. The 20% growth would seem to be linked, although it is not directly stated, with the York Central development. There is not a justification or explanation given for why there is lower growth in wholesale, retail and accommodation and food services specific to York.

101. If these were national trend there is no discussion of why this is relevant to York. Indeed, the latest available national data, show a decline in financial employment and increases in food and accommodation. York has seen a greater increase in food and accommodation business from 2009 – 2019 than the UK and England, and this sector is over represented, that is has a greater share than England and the UK.

102. Both food and accommodation and retail are key components of the York offer to visitors and tourists, as well as a large city with a rural hinterland. It does not seem credible without reasoned evidence to model this reduction.

103. If the reprofiled scenario (with these two specific changes to the updated baseline) are a means to model the York Central impact it should be showing the impact of this, as the Council state<sup>24</sup>:

“It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%. York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK”.

This would need to be read as over and above any prevailing growth trends.

104. The key outputs from EX/CYC/29 are recreated for reference below.

<b>GVA</b>				
	2017	2038	Change	%
<b>Baseline National</b>	5309	6929	1620	30.5
<b>Reprofiled</b>	5309	7030	1721	32.4

Data from

- Fig 3 2017 GVA
- Fig 15 2038 GVA and % Increase
- Change in £ Calculated for this report

<b>Employment</b>					
	2017	2038	Change	%	Annual
<b>Baseline National</b>	119531	129062	9531	7.97	454
<b>Reprofiled</b>	119531	130311	10780	9.02	513

Data from or calculated from Fig 16

<sup>24</sup> <http://www.yorkcentral.info/>

105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

#### Detailed Issues and Comments

##### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

##### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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Housing Delivery Trajectories

Total Housing

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period								
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46		
	Total																										
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																										
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	103	103	103	154	154	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	250	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300

Affordable Housing Only

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period								
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46		
	Total																										
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	9	18	26	26	26	35	53	53	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																										
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	26	26	26	39	39	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	63	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75

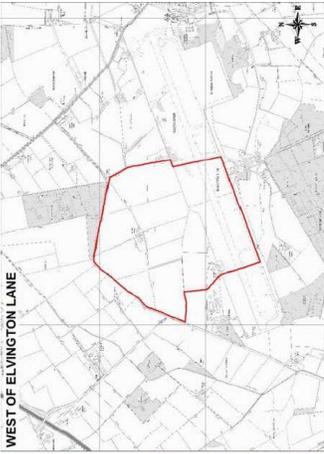
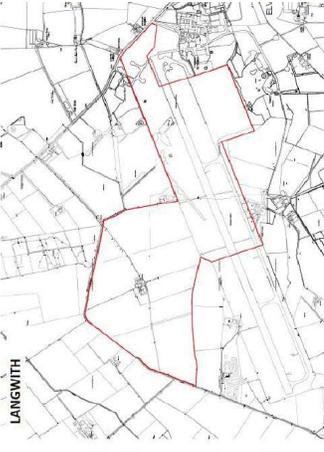
See Appendix 5 LDP's Representations to the York Local Plan PMS (June 2019) for background to above assumptions.



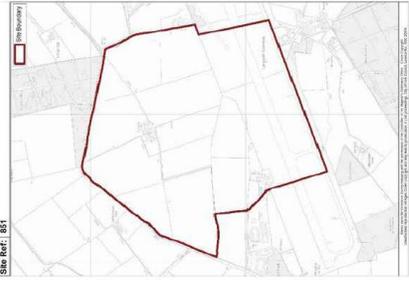
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

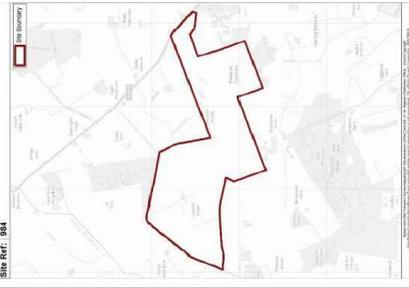
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>Langwith</b></p>		 <p>LANGWITH</p>  <p>LANGWITH</p>	<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>		<p><b>Spatial Strategy</b></p> <p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>	

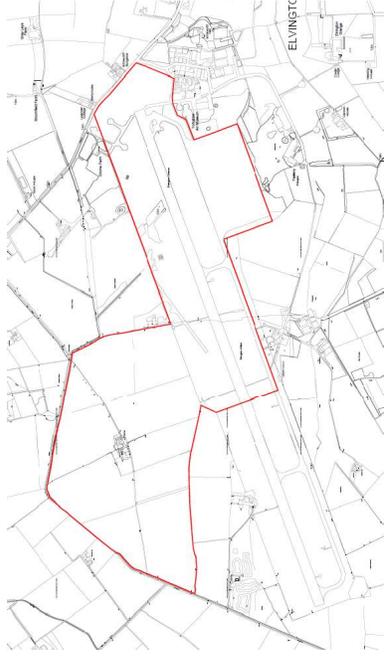
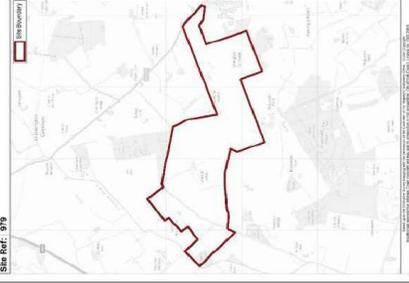
• Allocation – Site 851  
Site Ref: 851



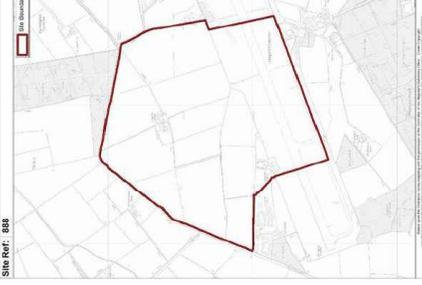
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



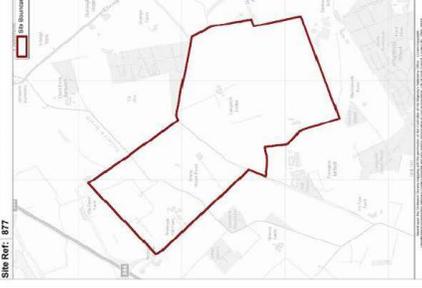
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



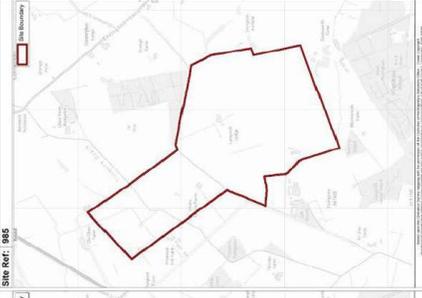
• Ait 3 Site 888 (Developer)  
Site Ref: 888



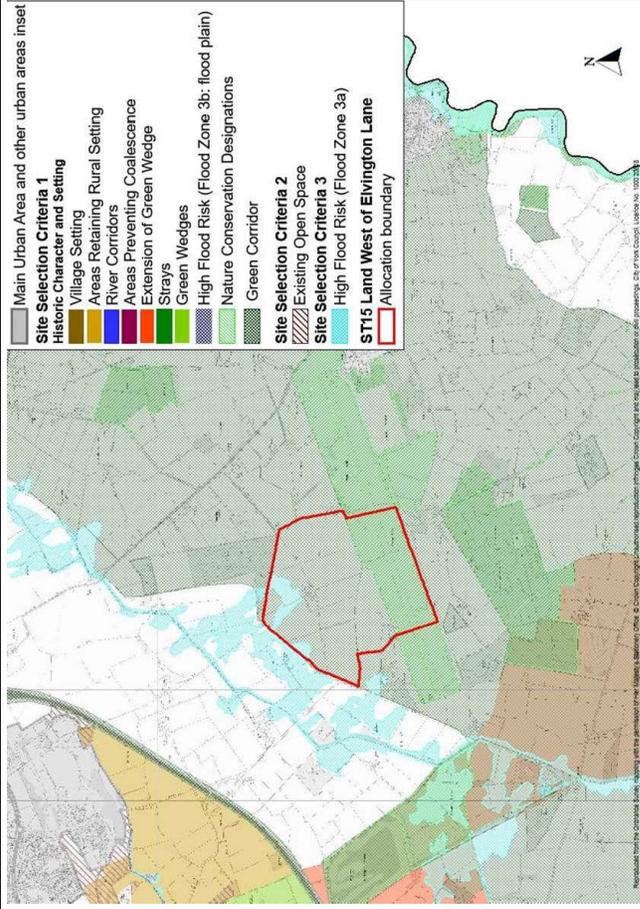
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy.**

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy.**

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

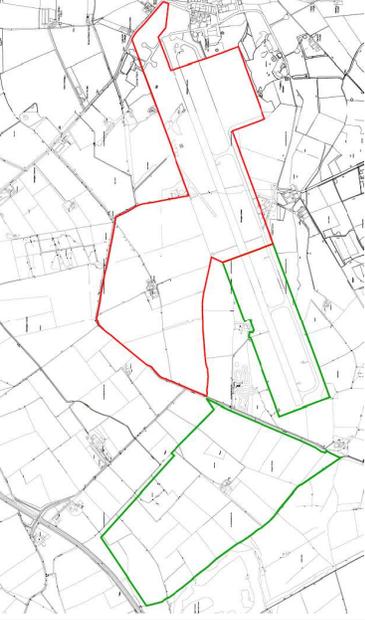
Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a free-standing settlement 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>		<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning. Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>	



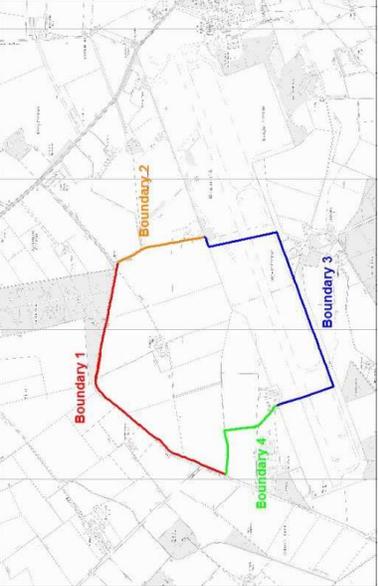
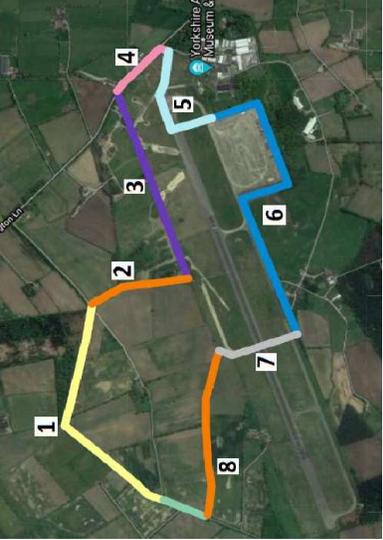
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Document Ref	Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>	

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
<p><b>ST15</b></p> <p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.</p> <p>(ii) Must form an identifiable, compact self-sustaining settlement.</p> <p>(iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.</p> <p>(iv) Must respect historic recreational routes.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipse Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation. The eastern extent is bound by Elvington Lane. The southern boundary follows the extent of Elvington Airfield. The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipse Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation. The eastern extent is bound by Elvington Lane. The southern boundary follows the extent of Elvington Airfield. The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

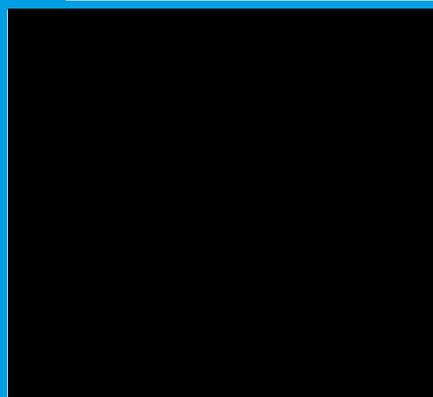
Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 16:33  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206068  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Strategic Flood Risk Assessment (EX/CYC/61)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

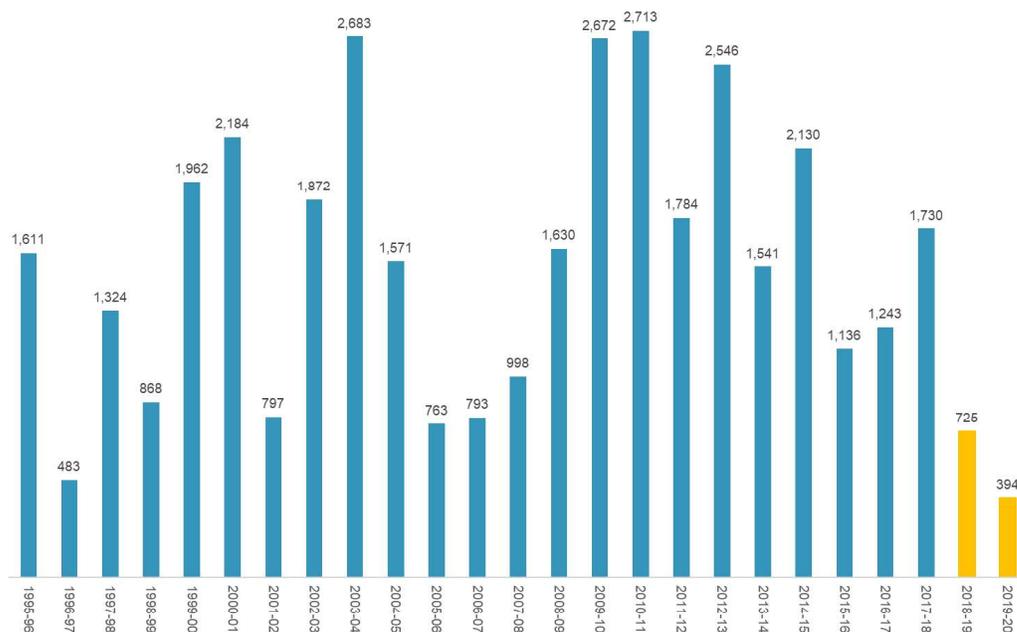
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16  
Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.

99. Section 6 (page 21) introduces the results for the Reprofiled Sectoral Growth scenario.

“Our detailed assumptions are as follows:

- 20% higher growth than the baseline projections within professional services, financial & insurance, and information & communication
- 10% lower growth than the baseline projections within wholesale & retail trade and accommodation & food services”

100. The 20% growth would seem to be linked, although it is not directly stated, with the York Central development. There is not a justification or explanation given for why there is lower growth in wholesale, retail and accommodation and food services specific to York.

101. If these were national trend there is no discussion of why this is relevant to York. Indeed, the latest available national data, show a decline in financial employment and increases in food and accommodation. York has seen a greater increase in food and accommodation business from 2009 – 2019 than the UK and England, and this sector is over represented, that is has a greater share than England and the UK.

102. Both food and accommodation and retail are key components of the York offer to visitors and tourists, as well as a large city with a rural hinterland. It does not seem credible without reasoned evidence to model this reduction.

103. If the reprofiled scenario (with these two specific changes to the updated baseline) are a means to model the York Central impact it should be showing the impact of this, as the Council state<sup>24</sup>:

“It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%. York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK”.

This would need to be read as over and above any prevailing growth trends.

104. The key outputs from EX/CYC/29 are recreated for reference below.

<b>GVA</b>				
	2017	2038	Change	%
<b>Baseline National</b>	5309	6929	1620	30.5
<b>Reprofiled</b>	5309	7030	1721	32.4

Data from

- Fig 3 2017 GVA
- Fig 15 2038 GVA and % Increase
- Change in £ Calculated for this report

<b>Employment</b>					
	2017	2038	Change	%	Annual
<b>Baseline National</b>	119531	129062	9531	7.97	454
<b>Reprofiled</b>	119531	130311	10780	9.02	513

Data from or calculated from Fig 16

<sup>24</sup> <http://www.yorkcentral.info/>

105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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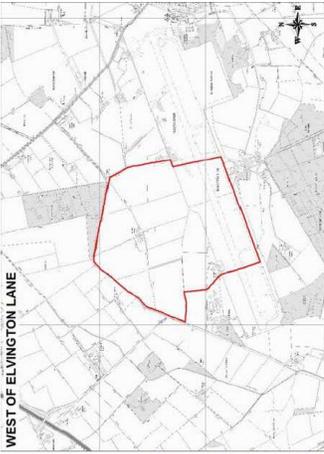
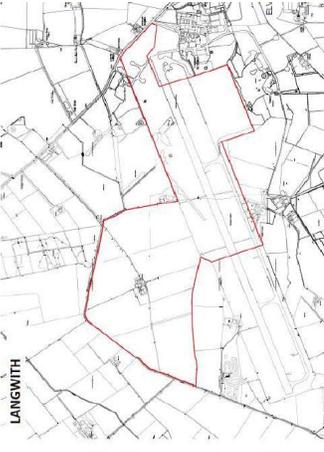




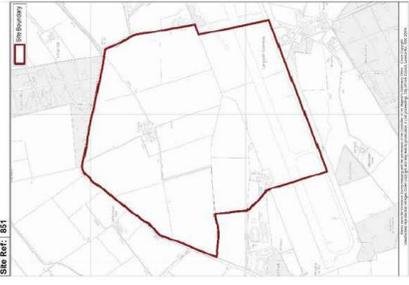
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

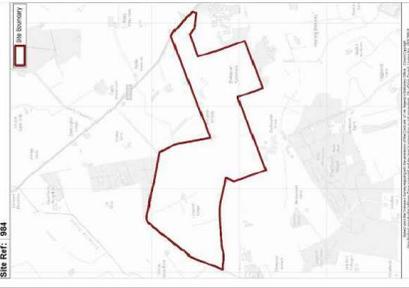
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>				
<p><b>Spatial Strategy</b></p>				
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>		<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>		

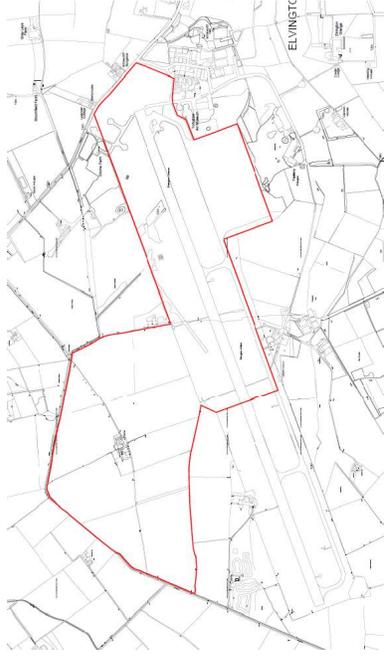
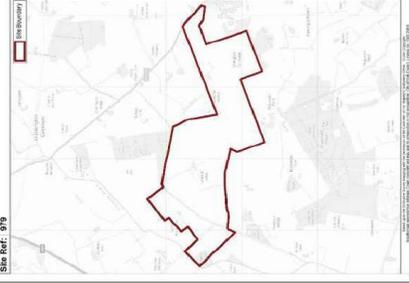
• Allocation – Site 851  
Site Ref: 851



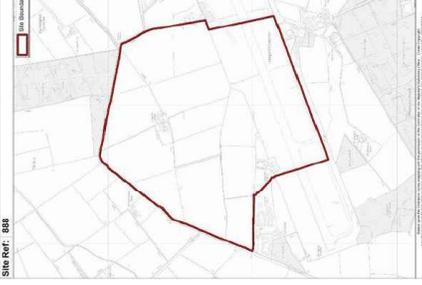
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



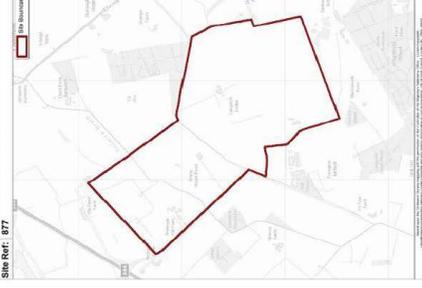
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



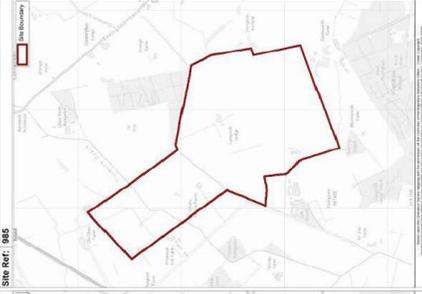
• Ait 3 Site 888 (Developer)  
Site Ref: 888



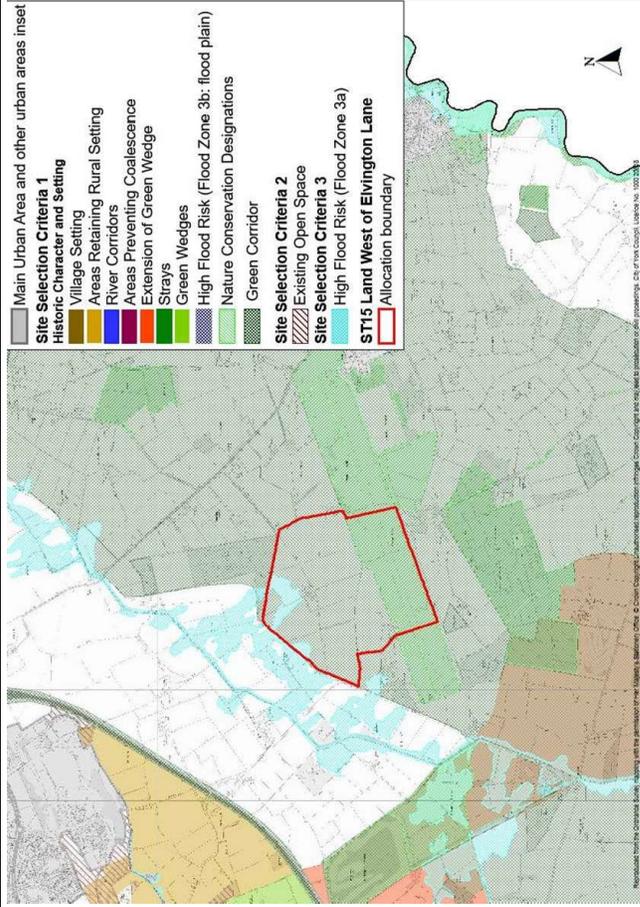
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severalextrabridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl			Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	
	1.2	Yes	4.1	Yes	4.2			No
	1.3	No	4.3	No	4.3			No
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment			The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	
	2.2	Yes	5.1	Yes	5.2			Yes
	2.3	No	5.3	Yes	5.3			Yes
Criterion 3: Landscape & Setting	3.1	Yes						
	3.2	No						

Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl			Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	
	1.2	Yes	4.1	Yes	4.2			No
	1.3	No	4.3	No	4.3			No
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment			The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	
	2.2	Yes	5.1	Yes	5.2			Yes
	2.3	No <td>5.3</td> <td>Yes</td> <td>5.3</td> <td>Yes</td>	5.3	Yes	5.3			Yes
Criterion 3: Landscape & Setting	3.1	Yes						
	3.2	No						

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning. Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		

	<p>medieval moated site within the proposed development area (Langwith Lodge). The boundary includes two additional historic farmsteads. Langwith Lodge, Langwith House and White House Farm (on the border of the site) are shown (in earlier forms) on the 1852 OS plan.</p> <p>North of the A64 lies the Heslington Conservation Area, c. 2.6km north of Langwith. Important to this Conservation Area is the rural context and openness of the landscape to the south of the village which would be maintained by this separation distance.</p> <p>The Minster Way pedestrian route is a non-designated heritage asset. This links the Minsters of York and Beverley travelling through predominantly tranquil countryside.</p> <p>Langwith as a freestanding settlement is set back from the A64 to mitigate impacts on key and local views. The location away from the A64 retains the context of long-distance views, whilst landscaping can appropriately mitigate and impact on local views.</p> <p>Langwith would therefore have minor harm in relation to landmark monuments.</p> <p><b>Landscape and Setting</b> <b>Criterion 3 – 3.1</b></p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to landscape and setting. However, effects are able to be mitigated through the scale and form of development, which seeks to retain the rural setting and further measures can mitigate significant effects as a result of development.</b></p> <p>This new settlement is located outside of the ring-road within the southwest quadrant of York. All land in this location is categorised as woodland arable lowland as mixed fringe farmland (Annex 1, evidence 8). It is currently a mix of planned enclosures and the former WWII Elvington Airfield.</p> <p>ST15 will form a new settlement within a 'clock face' of freestanding settlements surrounding York, which is a key characteristic of the city. The location of the settlement is set back by 1.5km from the A64 incorporating part of Elvington Airfield helping to establish a distinct settlement set in its own landscape context in accordance with the pattern of settlements.</p> <p>ST15 as a freestanding settlement set back from the A64 has been arrived at iteratively to respond to the HIA issues such as avoiding significant adverse impacts on the setting of York or key views across the open countryside. Whilst the location avoids areas identified by "The Approach to the Green Belt Appraisal" (2003, and its subsequent updates) [Annex 1, evidence 11] as important in preserving the setting and special character of York, the boundary for ST15 responds to outcomes in the HIA wherein it identifies that views across the site to the Wolds and towards the city centre may be adversely affected from development immediately to the south of the A64. Additionally, development not sufficiently set back may be perceived as a continuation of development as part of the main urban area, constituting sprawl or have future potential for coalescence.</p> <p>ST15 as a freestanding settlement is considered to have minor to significant harm in the HIA on the landscape and setting of York. However, the scale and form of development seeks to retain the rural setting and pattern of development; further measures can mitigate significant effects as a result of development to strengthen its landscape context as part of ensuring high environmental quality and to support the character and setting of the city. All of the site would need to include carefully designed landscaping and buffering to its outer edges, particularly their northern boundaries, to lessen harm of a new settlement in this location.</p>	<p>There is a medieval moated site within the proposed development area (Langwith Lodge). The boundary includes two additional historic farmsteads. Langwith Lodge, Langwith House and White House Farm (on the border of the site) are shown (in earlier forms) on the 1852 OS plan.</p> <p>North of the A64 lies the Heslington Conservation Area, c. 2.6km north of Langwith. Important to this Conservation Area is the rural context and openness of the landscape to the south of the village which would be maintained by this separation distance.</p> <p>The Minster Way pedestrian route is a non-designated heritage asset. This links the Minsters of York and Beverley travelling through predominantly tranquil countryside.</p> <p>Langwith as a freestanding settlement is set back from the A64 to mitigate impacts on key and local views. The location away from the A64 retains the context of long-distance views, whilst landscaping can appropriately mitigate and impact on local views.</p> <p>Langwith would therefore have minor harm in relation to landmark monuments.</p> <p><b>Landscape and Setting</b> <b>Criterion 3 – 3.1</b></p> <p><b>Delivery of Langwith has a potential to result in minor harm in relation to landscape and setting. However, any effects are able to be mitigated appropriately through the scale and form of development, which seeks to retain the rural setting, return part of the former airfield to greenfield land and align with the historic character of York as a compact city surrounded by freestanding settlements.</b></p> <p>Langwith is located outside of the A64 ring road within the south-west quadrant of York. All land in this location is categorized as woodland arable lowland and missed fringe farmland (Annex 1, evidence 8). It is currently a mix of planned enclosures and the former WWII Elvington Airfield.</p> <p>Langwith will form a new settlement within a 'clock face' of freestanding settlements surrounding York, which is a key characteristic of the city. It is set c. 1.5km from the A64 and incorporates a considerable part of Elvington Airfield (brownfield land), helping to establish a distinct and sustainable settlement set in its own landscape context in accordance with the pattern of settlements.</p> <p>By setting back Langwith from the A64 any adverse impacts on the historic setting of York are avoided, and there would be no perception of urban sprawl or coalescence. There are also small woodland areas between the A64 and parts of the northern boundary, with opportunities to further screen and limit any views through landscaping features along the boundary with lower density housing beyond. Any adverse impacts on key views across the open countryside can therefore be avoided.</p> <p>The scale and form of Langwith as a freestanding settlement responds positively to York's acute housing needs whilst retaining the rural setting and pattern of development across York. The masterplanning and landscaping of the settlement, in particular the buffering to its boundaries, can further strengthen its landscaped context and ensure a high-quality environment which complements the wider character and setting of the city.</p> <p>The western part of the existing runway, which falls beyond the boundary of the settlement, will also be returned to greenfield land as part of the overall approach to habitat enhancement. This will reinforce a new, soft landscaped aspect to the western boundary and create a clear separation and boundary for this part of Langwith.</p> <p>Langwith aligns with the concept of a compact city surrounded by</p>
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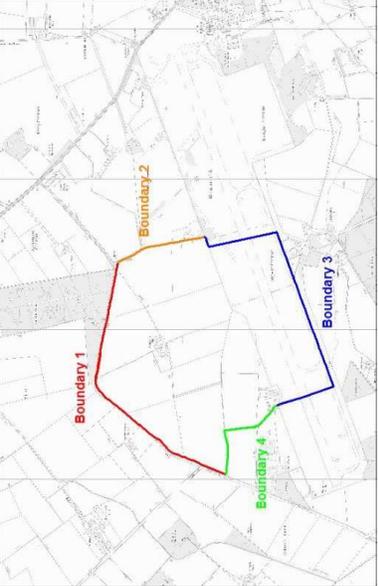
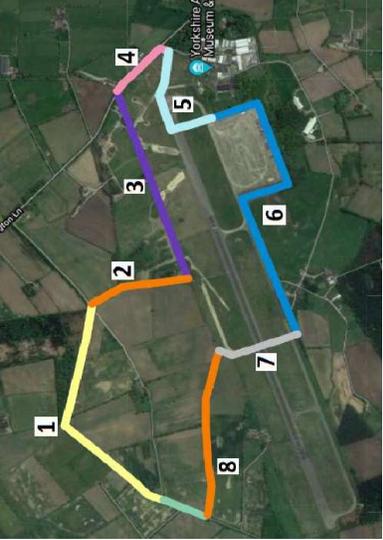
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>	<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p> 	<p><b>ENCROACHMENT OVERALL.</b></p>
	<p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	

Sustainability Appraisal	
ST15	Document Ref
<p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Langwith</b></p> <p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p> <ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
<b>ST15</b>	<b>Site specific boundary considerations from Green Belt Purpose analysis.</b>	<b>Proposed boundary description and recognisability</b>
	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.</p> <p>(ii) Must form an identifiable, compact self-sustaining settlement.</p> <p>(iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.</p> <p>(iv) Must respect historic recreational routes.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different historical features in the form of natural features offers strength and resilience to change.</p> <p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>
	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p> <p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

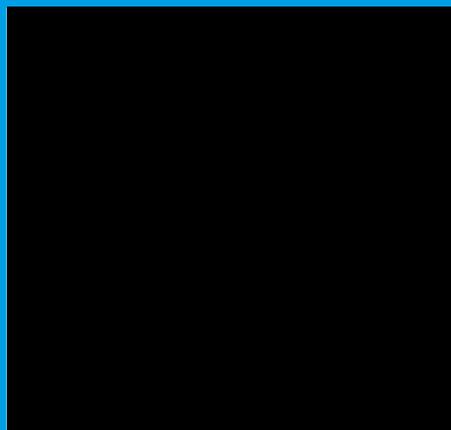
Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod



**From:** [REDACTED]  
**Sent:** 07 July 2021 16:20  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206063  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

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## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

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## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications (EX/CYC/59h)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

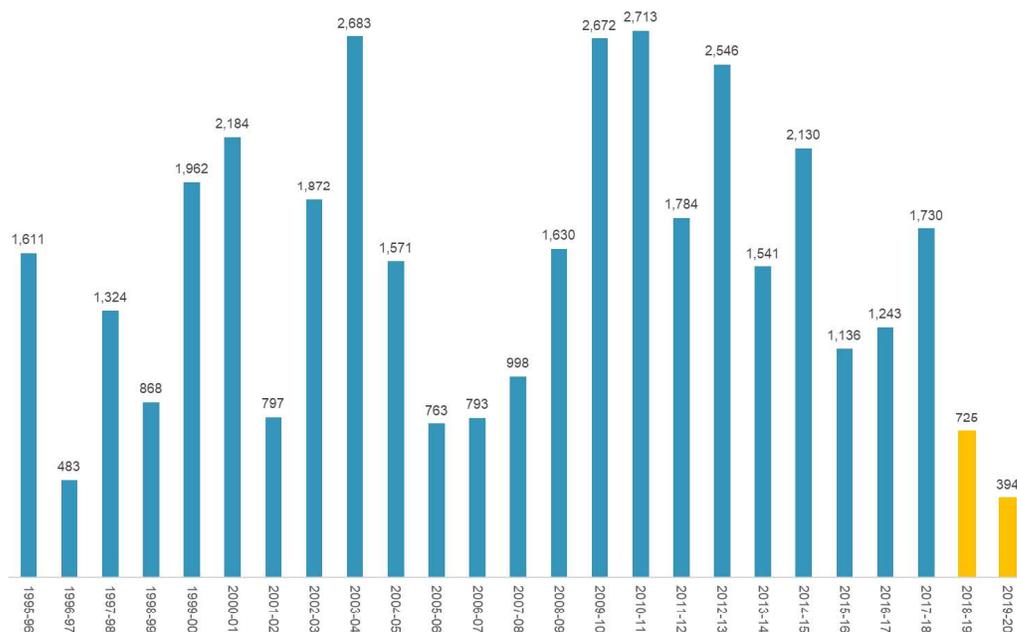
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

<b>Period Average</b>	<b>Average Employment</b>	<b>20% uplift to trend</b>	<b>Implied York Central impact on average employment</b>
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York’s economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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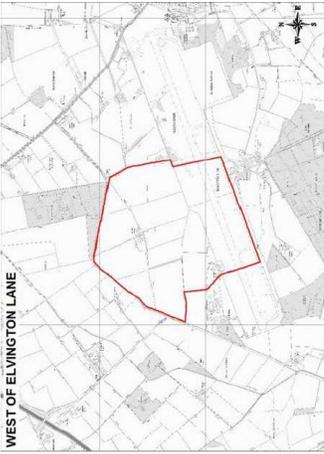
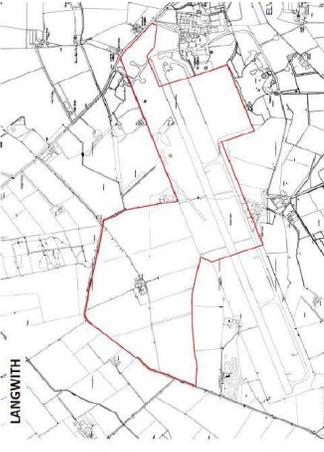




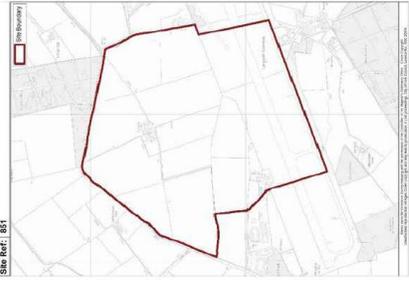
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

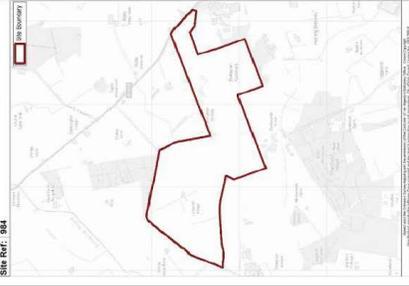
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>		<p><b>Spatial Strategy</b></p> <p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p> <p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>		

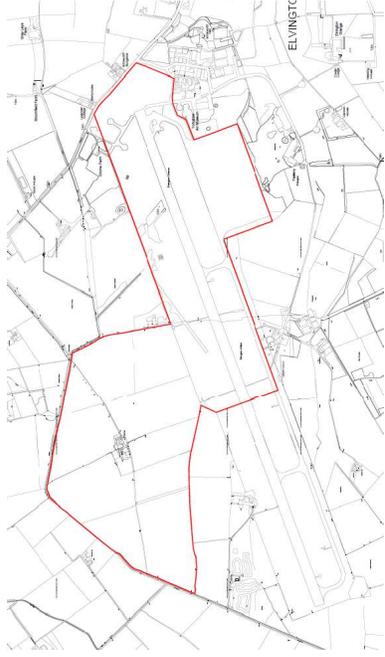
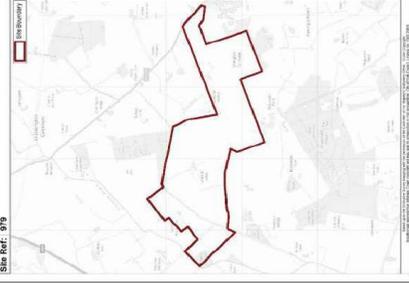
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Site Ref: 851



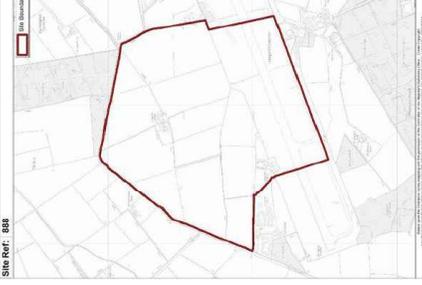
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Site Ref: 884



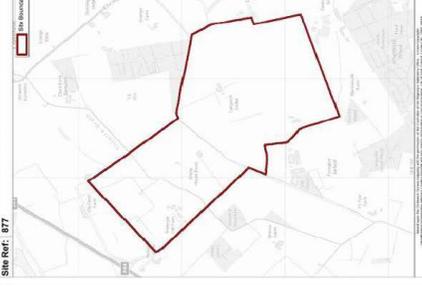
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



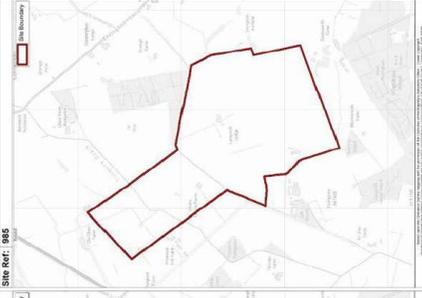
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Site Ref: 888



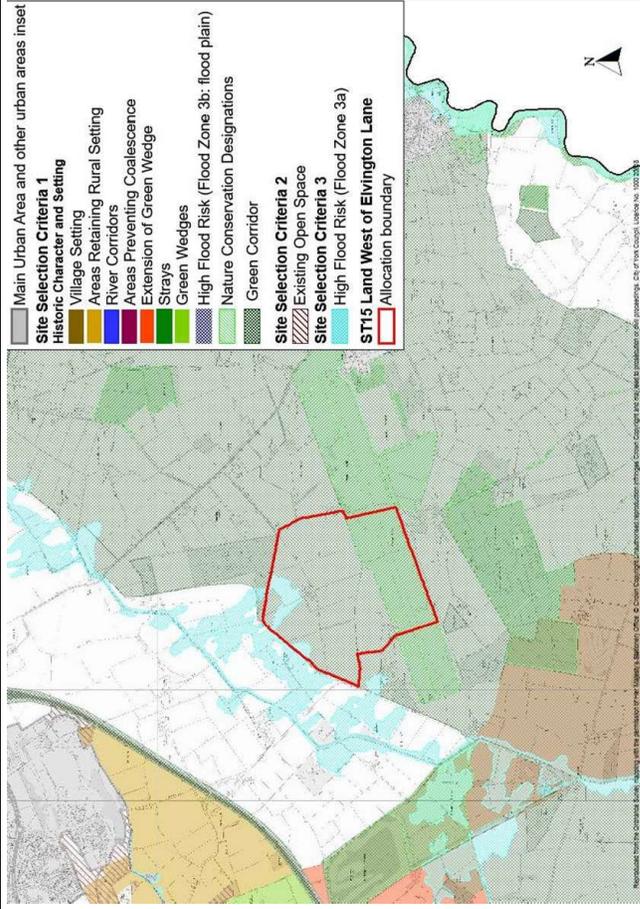
• Alt 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
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Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severalextrajunctions / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severalextrajunctions / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

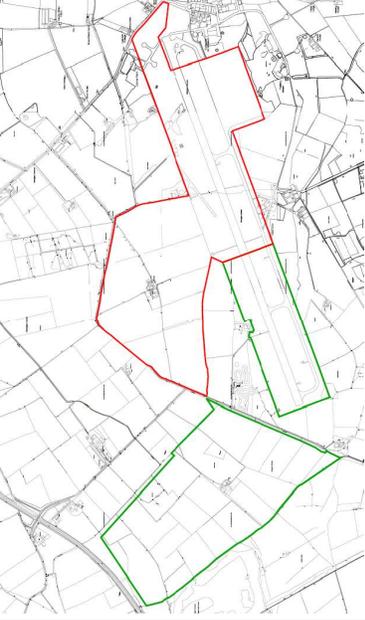
Criterion 1: Compactness	1.1	Yes	Criterion 4: Sprawl			Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.	
	1.2	Yes	4.1	Yes	4.2			No
	1.3	No	4.3	No	4.3			No
Criterion 2: Landmark Monuments	2.1	Yes	Criterion 5: Encroachment			Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.	
	2.2	Yes	5.1	Yes	5.2			Yes
	2.3	No	5.3	Yes	5.3			Yes
Criterion 3: Landscape & Setting	3.1	Yes				The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.		
	3.2	No						

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



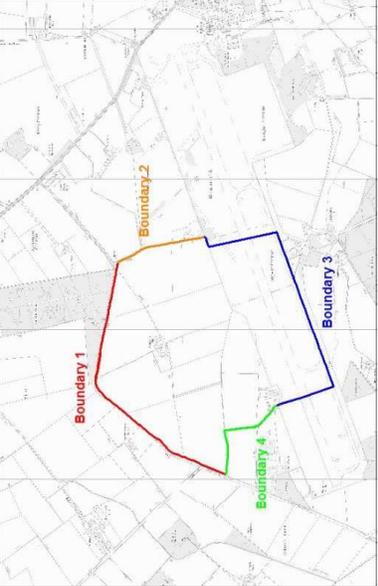
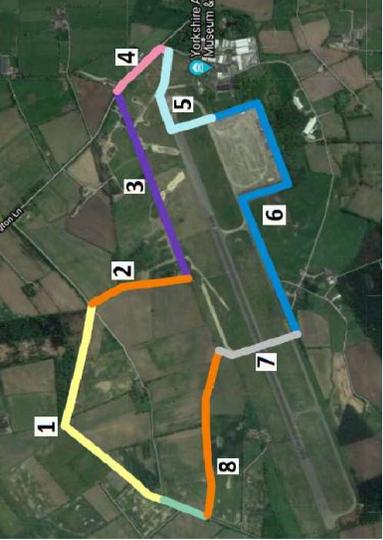
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<b>ENCROACHMENT OVERALL.</b>
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Sustainability Appraisal	
ST15	Document Ref
<p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Langwith</b></p> <p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p> <ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
ST15	Langwith	Langwith
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to the reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



## Quod

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**From:** [REDACTED]  
**Sent:** 07 July 2021 16:36  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206076  
**Attachments:** Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

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## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Sustainability Appraisal of the Composite Modifications Schedule (April 2021) (EX/CYC/62)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be legally compliant:**

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## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** No, I do not consider the document to be sound

**Please justify why you consider the document to be sound:**

**Please justify why you do not consider the document to be sound:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

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## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:** Please refer to Representations of the City of York Local Plan (July 2021, Quod), titled Response to Consultant on Key Evidence and Supporting Documentation (May 2021).

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** Yes, I wish to participate at hearing sessions

**If you do wish to participate at hearing sessions, please state why:** In order to present in person on the matters raised in the attached report and previous representations.

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## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

Reps\_to\_the\_City\_of\_York\_Local\_Plan\_JULY\_2021\_FINAL\_UPLOAD.pdf

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Quod

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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020

CYC Ref	Document
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy , and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

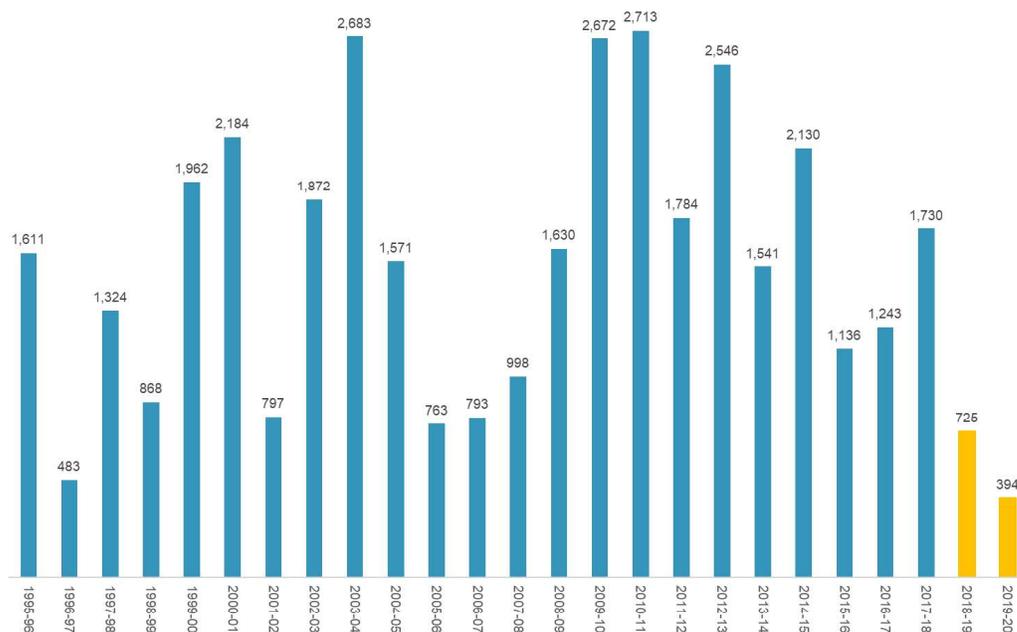
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

[Figure 5. Age Changes](#)

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

<b>Period Average</b>	<b>Average Employment</b>	<b>20% uplift to trend</b>	<b>Implied York Central impact on average employment</b>
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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Housing Delivery Trajectories

Total Housing

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period							
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	
	Total																									
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																									
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	103	103	103	154	154	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	250	300	300	300	300	300	300	2875	300	300	300	237					

Affordable Housing Only

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)					Beyond Plan Period							
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46	
	Total																									
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	9	18	26	26	26	35	53	53	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																									
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	26	26	26	39	39	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	63	75	75	75	75	75	719	75	75	75	75	59					

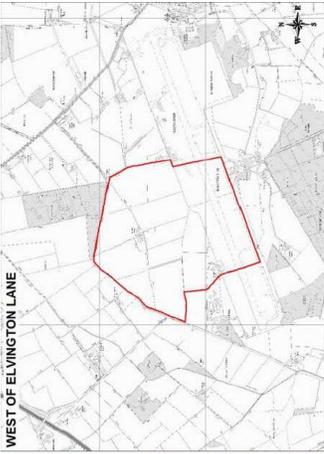
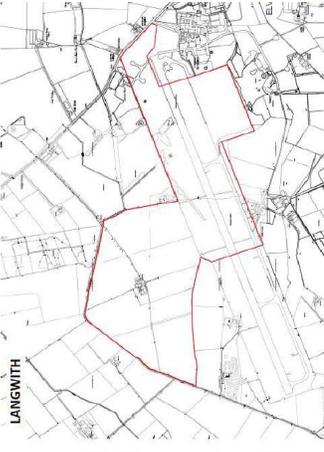
See Appendix 5 LDP's Representations to the York Local Plan PMS (June 2019) for background to above assumptions.



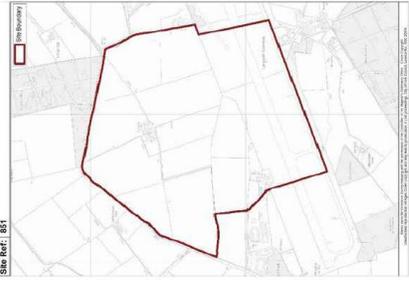
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

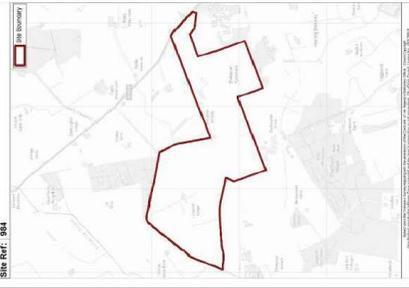
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>Langwith</b></p>		 <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>		<p><b>Spatial Strategy</b></p>	
<p><b>Land Submitted for Consideration</b></p>		<p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>	<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>

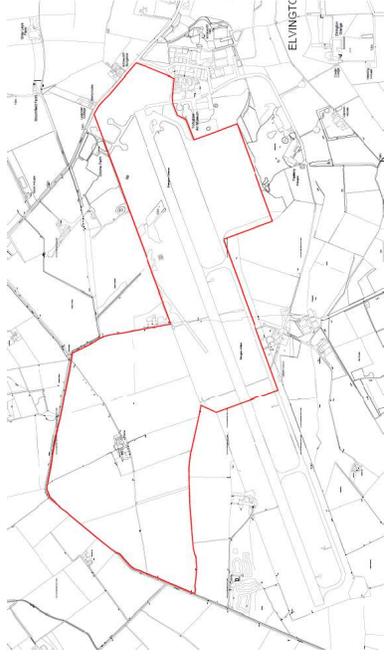
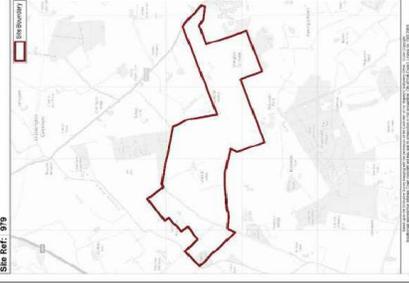
• Allocation – Site 851  
Site Ref: 851



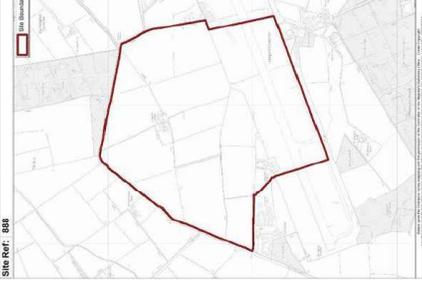
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



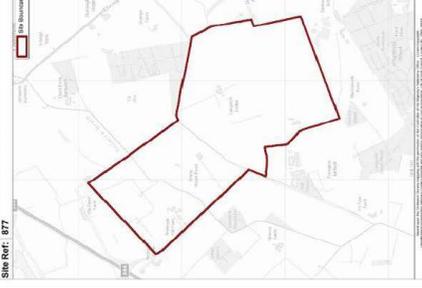
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



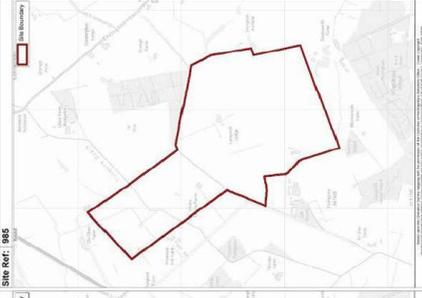
• Ait 3 Site 888 (Developer)  
Site Ref: 888



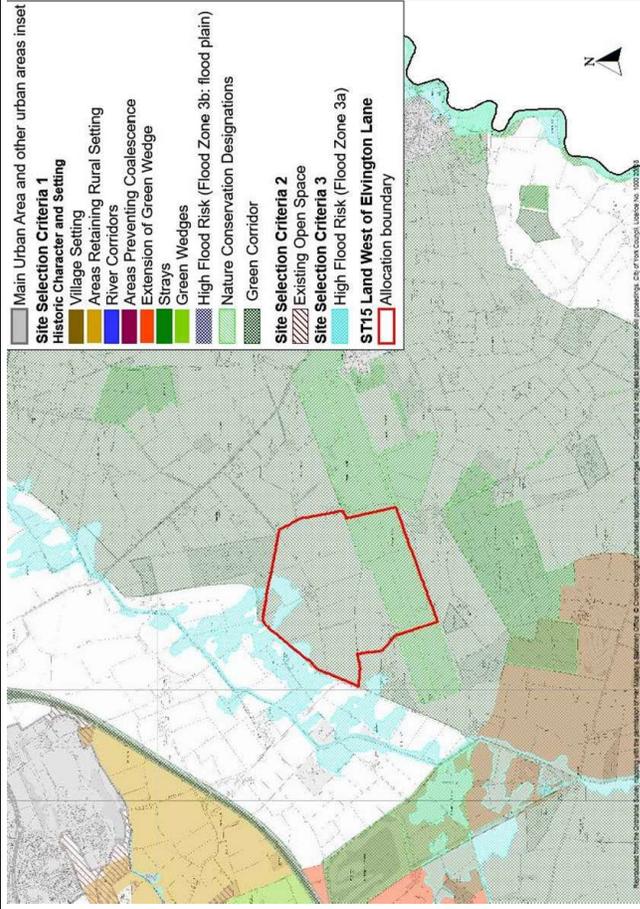
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy.**

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy.**

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

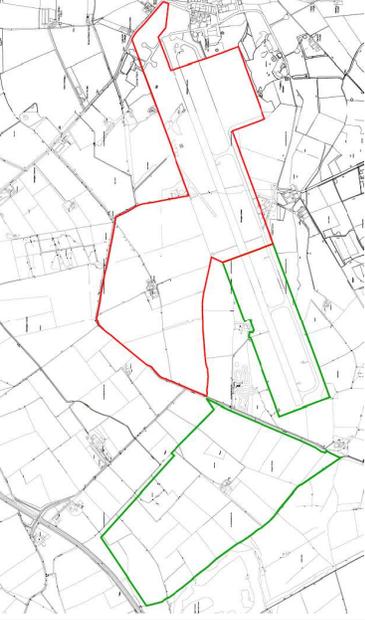
Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes					
	3.2	No					

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to compactness of the main urban area. However, the HIA identifies that any significant harm to this purpose can be mitigated to minor harm through masterplanning.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has a potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN COMPARISON TO ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. HARM CAN BE MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning.</p> <p>Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>		



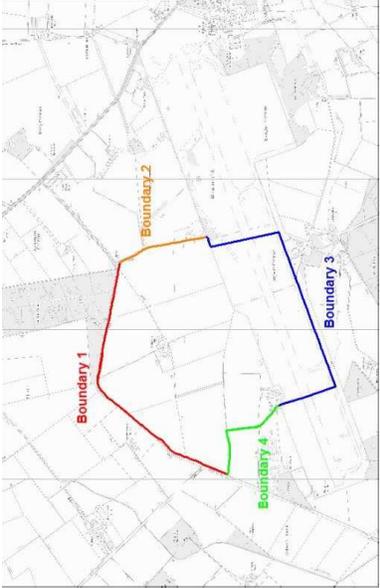
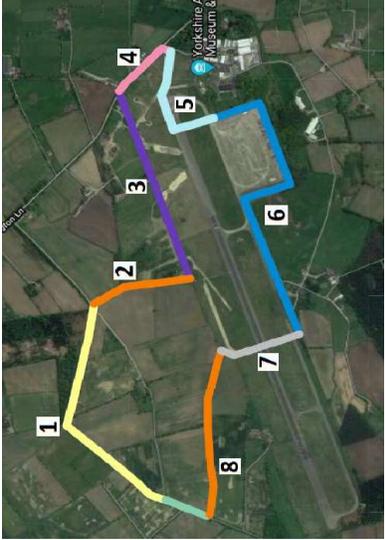
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<p><b>Document Ref</b></p> <ul style="list-style-type: none"> <li>• SA main report (2018)</li> <li>• [CD008] Strategic Sites, page 116.</li> <li>• SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>• [CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>• SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
ST15	Langwith	Langwith
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>		<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to the reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

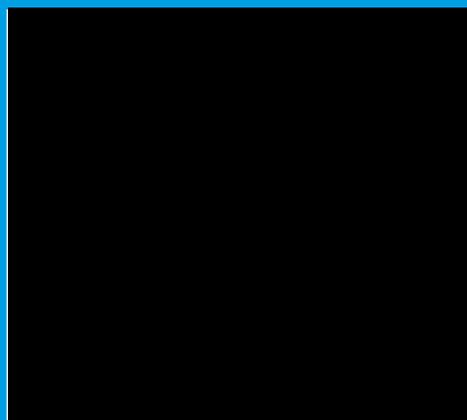
Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



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**From:** [REDACTED]  
**Sent:** 07 July 2021 18:11  
**To:** localplan@york.gov.uk  
**Subject:** York Local Plan Representations  
**Attachments:** Reps to the City of York Local Plan JULY 2021 FINAL UPLOAD.pdf

**Follow Up Flag:** Follow up  
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Hi There

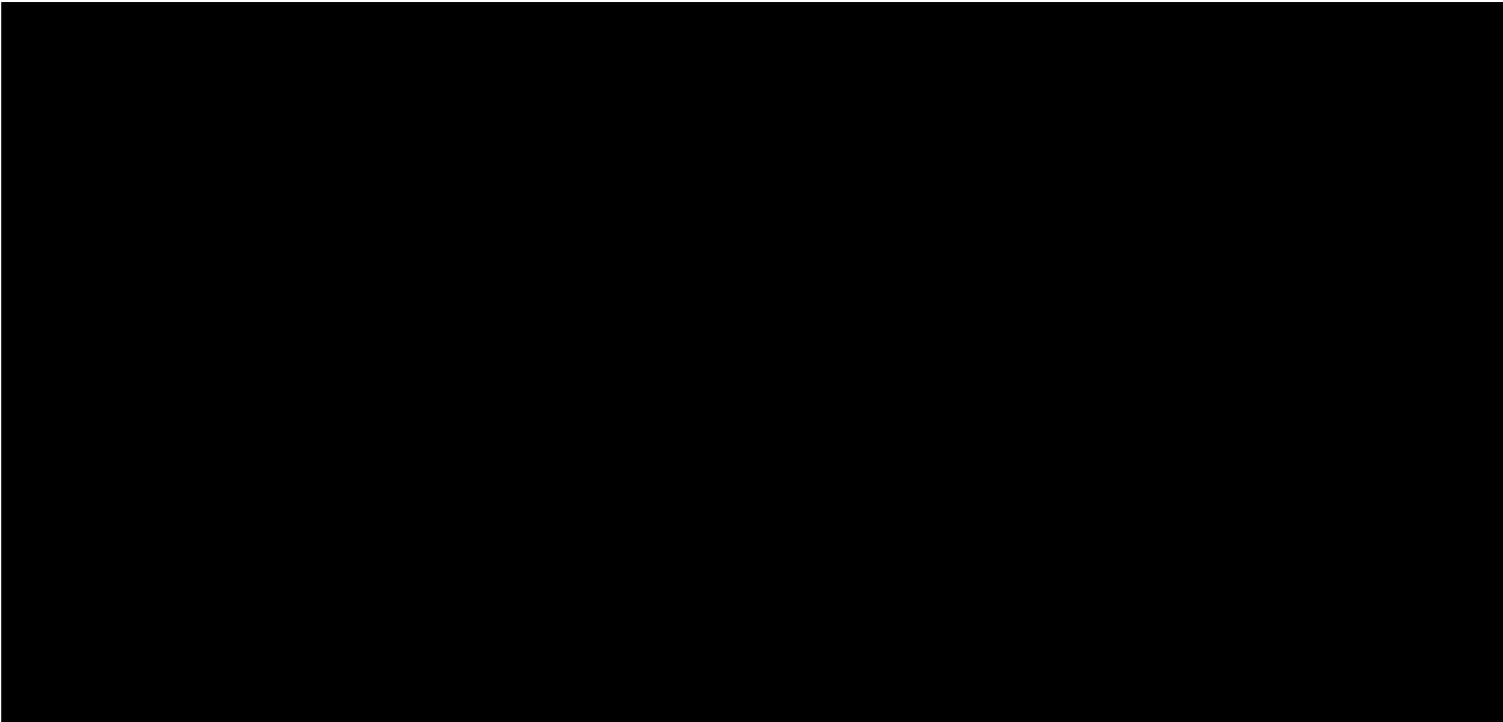
I have submitted the below forms today against the below categories along with the attached report. I just wanted to double check you had it and so wanted to email you it too.

I made two typos on the [EX/CYC/58](#) and [EX/CYC/29](#) when filling out the form I referred to our documents as the wrong date in the titles is that an issue? It should be July 2021 and May 2021.

Kind regards

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
<a href="#">EX/CYC/37</a>	Audit Trail of Sites 35 to 100 Hectares
<a href="#">EX/CYC/43a</a>	Housing Needs Update September 2020
<a href="#">EX/CYC/45</a>	Habitats Regulations Assessment 2020
<a href="#">EX/CYC/45a</a>	Habitats Regulations Assessment 2020 Appendices
<a href="#">EX/CYC/56</a>	Strategic Housing Land Availability Assessment Update (April 2021)
<a href="#">EX/CYC/59</a>	Topic Paper 1 Approach to defining Green Belt Addendum January 2021
<a href="#">EX/CYC/59a</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base

CYC Ref	Document
<a href="#">EX/CYC/59g</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites
<a href="#">EX/CYC/59h</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications
<a href="#">EX/CYC/59i</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update
<a href="#">EX/CYC/59j</a>	Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory
<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)





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**Representations to the  
City of York Local Plan**  
Response to Consultation  
on Key Evidence and  
Supporting Documentation  
(May 2021)

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LANGWITH DEVELOPMENT PARTNERSHIP LTD

JULY 2021

Q70385

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# Appendices

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- Appendix 1 York Housing Need 2021 Update (Understanding Data)
- Appendix 2 LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)
- Appendix 3 LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)
- Appendix 4 LDP's Green Belt Assessment (update) for Langwith

# Introduction

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- 1.1 These representations are made on behalf of Langwith Development Partnership Ltd (LDP). LDP have been engaged in York Local Plan process for a number of years, and have made previous representations (and objections) to the emerging York Local Plan (emerging Plan) including:
- 1.1.1 Site Promotion – Planning Document (September 2016).
  - 1.1.2 Site Promotion – New Garden Village at Elvington Airfield and Adjoining Land (October 2017).
  - 1.1.3 Representations to the draft Local Plan (2017) (Regulation 18) (October 2017).
  - 1.1.4 Representation to the City of York Local Plan – Publication Draft February 2019 (Regulation 19) (March 2018). ([CD014G](#) pages 358-1059).
  - 1.1.5 Representations to the City of York Local Plan Proposed Modifications (June 2019) and Associated Background Documents (July 2019). ([EX/CYC/21b](#) pages 2187-2328).
  - 1.1.6 Appearances at the first stage examination of the Local Plan in (December 2019) dealing with Matters 1, 2 and 3 ([EX/HS/M1/LR/16](#), [EX/HS/M2/HMA/15](#), [EX/HS/M3/EC/33](#)).
- 1.2 The purpose of this report is to respond to various documents which are being consulted upon as part of the next stage of the emerging Plan’s examination.

## Documents Upon which LDP Comment

- 1.3 This Report specifically considers the following documents:

CYC Ref	Document
<a href="#">EX/CYC/58</a>	Composite Modifications Schedule April 2021
<a href="#">EX/CYC/29</a>	York Economic Outlook December 2019
<a href="#">EX/CYC/32</a>	CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019
<a href="#">EX/CYC/36</a>	Affordable Housing Note Final February 2020
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<a href="#">EX/CYC/61</a>	Strategic Flood Risk Assessment
<a href="#">EX/CYC/62</a>	Sustainable Appraisal of the Composite Modifications Schedule (April 2021)

## National Planning Policy Framework

- 1.4 The emerging Plan is being examined under the National Planning Policy Framework published in March 2012 (NPPF1). A new NPPF was published in July 2018, with revisions in February 2019 (NPPF2). NPPF2 includes a transitional arrangement<sup>1</sup> whereby, for the purpose of examining this emerging Plan, the policies of NPPF1 will apply. Similarly, whilst the Planning Practice Guidance (PPG2) has been updated to reflect NPPF2, the previous version of the PPG (herein referred to as PPG1) apply for the purpose of this examination under the transitional arrangements.
- 1.5 Unless stated otherwise, references in this Report are, therefore, to the NPPF1 of 2012 as well as the versions of the PPG that were extant prior to the publication of NPPF2.

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<sup>1</sup> Paragraph 214 of NPPF2.

- 1.6 As a consequence of the above, City of York Council (CYC) is in an unusual position where their emerging Plan is being considered against national policy that is almost 10 years old and has changed materially in respect of some of the matters that are relevant to plan making. Furthermore, at the time of the introduction of the transitional arrangements in NPPF2, the Government would not have anticipated the circumstances in which this emerging Plan currently finds itself. That is to say that the emerging Plan was submitted to the Secretary of State (SoS) over 3 years ago, its examination is likely to continue into 2022 and adoption possibly not until later that year, and probably 2023, i.e., four (and probably five) years after submission to the Secretary of State and, therefore, over four years after, changes in National Policy and Guidance.
- 1.7 Consequently, there are evident conflicts in respect of policy considerations between NPPF1 and NPPF2 when assessing the soundness of this emerging Plan which present the Inspectors with difficulty in reconciling the different policy approaches. This is most evident in relation to the issue of housing need (see Section 2 of these Representations), as this Report goes on to demonstrate.

## Plan Period

- 1.8 The complications of reconciling changing policies (between NPPF1 and NPPF2) in the examination of this emerging Plan is compounded by it being necessary for CYC to update the evidence base of the emerging Plan during the past three years. Consequently, the foundations and the approach of the emerging Plan and the policies contained within it have been constantly evolving. Even at the time of preparing this Report, further changes in relation to population data have been released by ONS (in June 2021).
- 1.9 One of the key effects of the delay in the examination of the emerging Plan is the implications for the strategic plan period the emerging Plan should cover.
- 1.10 The emerging Plan was submitted in 2018, with a Plan Period that covers 2017-2033. However, the emerging Plan is unlikely to be adopted, if the Inspectors find it sound, until 2022 at the earliest, and more likely in 2023. By this time at least five (and probably six) years of the Plan Period will have expired, and there will remain only 11 years at best.
- 1.11 NPPF1 notes that it is crucial that Local Plans should be “*drawn up over an appropriate timescale, preferably a 15 year time horizon....*”<sup>2</sup> (as well as NPPF2<sup>3</sup>) in order to take account of longer-term requirements. It is LDP’s position, as explained later in this report (Section 4) that the Plan Period currently promoted within the emerging Plan is now out of date and should be extended. This is particularly important in the case of York, where such boundaries are being set for the first time and National Policy requires the Green Belt Boundary to be set “*...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period*”<sup>4</sup>.

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<sup>2</sup> Paragraph 157 of NPPF1.

<sup>3</sup> Paragraph 22 of NPPF2.

<sup>4</sup> Paragraph 83 of NPPF1 (and correspondingly repeated in paragraph 136 of NPPF2).

## LDP's Case

1.12 The fundamental case made as part of the previous Representations to the emerging Plan (especially those at the Regulation 19 stage, the Proposed Modifications to the Regulation 19 Plan and, most recently at the examination of the emerging Plan in December 2019) were formed on the following matters:

1.12.1 The Objectively Assessed Needs (OAN) for housing in the emerging Plan fails to adequately meet the full OAN in York. The emerging Plan is, therefore, not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.12.2 The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based on spatial strategy evidence underpinned by a strong heritage objective aimed at protecting the heritage importance of York settlement.

1.12.3 The soundness of Policy (SS13) and the boundary proposed allocation for a new garden village in the south east of the City (draft Allocation Ref ST15) is unproven, given there is no of evidence to demonstrate it is deliverable via a single point of access (to the A64).

1.12.4 Modifications to allocation ST15, in the form outlined in the Representations by LDP (i.e., Langwith Garden Village), present a readily deliverable and sustainable new settlement, and provides a sustainable allocation, capable of meeting the City's housing need in part. The eastern access of the Langwith masterplan would enable a new settlement to meet CYC's housing needs in a more timely and reliable manner than ST15 could.

1.13 Since the making of the previous Representations, and the release of the further information, which is currently subject to consultation, LDP's position in relation to the emerging Plan remains largely unchanged, and these Representations maintain that:

1.13.1 The emerging Plan still fails to adequately meet the full OAN for York. The emerging Plan, therefore, remains unsound on the grounds that it is not positively prepared, justified, effective and is inconsistent with National Planning Policy.

1.13.2 The specification of the proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, judging from CYC's supporting, and most notably the need to meet York's housing needs whilst minimising heritage impacts.

1.13.3 The soundness of the proposed allocation of ST15 is unproven in the following ways:

- The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable, although it can be modified to become so in the manner demonstrated by LDP (see their previous representations-at CD014G).

- There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64.
- There is no evidence currently before the examination to demonstrate that ST15 is deliverable.
- There is a lack of appropriate environmental evidence before the examination to demonstrate that it is environmentally sustainable.
- There is no evidence before the examination that demonstrates that it is typically viable<sup>6</sup>.

1.14 In response to the above, LDP have presented a modified boundary to draft allocation ST15, which presents a deliverable, sustainable and environmentally appropriate new Garden Village (Langwith), which will better and more reliably meet the City's housing needs<sup>5</sup>.

1.15 LDP would not rule out the potential to adjust this boundary and have been in discussions with CYC whilst the emerging Plan is under consideration on how the boundary could be modified.

### **Modifications to the Boundary of ST15**

1.16 During the examination of the emerging Plan, LDP have been in discussions with CYC in relation to the soundness of ST15, and notably the evidence (including lack of it) in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues.

1.17 It is anticipated that in due course, LDP and CYC will prepare a SoCG in relation to the soundness of the boundary of ST15.

1.18 It remains LDP's opinion, based on evidence presented to the examination of the emerging Plan<sup>6</sup>, that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. LDP consider that the boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective, as well as helping to better meet the strategic development needs of the City for reasons explained in the previous Representations, and which equally apply if not more so given the Key Evidence and Supporting Documentation which this Report responds.

1.19 Leaving aside the environmental and viability issues, it remains LDP's view that allocation ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation

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<sup>5</sup> The case for Langwith has been made in the previous submission to the Regulation 19 Local Plan (([CD014G](#) pages 358-1059) and the more recent representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#) pages 2187-2328).

1.20 Whilst Policy SS13 of the emerging Plan acknowledges a second point of access may be “*potentially*” required, it fails to recognise that a second point of access is necessary.

### **Summary of Representations to the Consultation on Key Evidence and Supporting Documentation (May 2021)**

1.21 In light of the above and in response to the further evidence and supporting documents under consultation, these Representations maintain LDP’s previous objections and, namely:

1.21.1 The Proposed Modifications fail to address the OAN of the City.

1.21.2 The housing needs update September 2020 (EX/CYC/43a) is unsound.

1.21.3 In order to make the emerging Plan sound, the housing requirements (Policy SS1) should be increased substantially over the Plan Period.

1.21.4 The Plan Period should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to “safeguard” land (i.e., remove it from the Green Belt, but hold it back for development) then the Green Belt needs to be drawn so that it meets development needs beyond the Plan Period, by at least five years (if the Plan Period is to be extended). LDP therefore suggest the Plan Period should extend to 2038, and with allocations sufficient to meet needs to 2043.

1.21.5 The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate.

1.21.6 CYC have overestimated the housing land supply within the City.

1.21.7 CYC have, been overly optimistic in the trajectory of housing delivery in relation to ST15, but with modifications too Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery.

1.21.8 As a consequence of the above, the Proposed Modifications to Policy H1 are unsound.

1.21.9 Historic levels of housing completion have demonstrated that the City has not been delivering at the rates required and this is compounded by the fact that a good level of the housing delivery has been made up of student accommodation (rather than traditional housing).

1.21.10 The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15, subject to the Proposed Modifications to Polices Ss13 and G12 (CD003 and EX/CYC/58).

- 1.21.11 The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites which are within high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zone 2 and 3, previous flood modelling by the promoters demonstrates the extent of the Flood Zone 2 and 3 are less extensive, and any limited localised flood risk within this part of any future allocation is entirely capable of being mitigated through careful masterplanning in those areas. This would be equally applicable to Langwith or a variation of it (as indicated earlier at paragraph 18).
- 1.21.12 The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact".
- 1.21.13 For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, there are sound reasons for a larger settlement boundary (akin to Langwith, or a variation of it).
- 1.21.14 An extended boundary to ST15, to align with Langwith (or a variation of it) is demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187-2328 and CD014G at pages 358-1059) to be appropriate having regard to the five purposes of Green Belt, as well as being clearly defined and readily)<sup>6</sup>.

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<sup>6</sup> Paragraph 85 of NPPF (Paragraph 139 of NPPF2)

# Housing Need Issues

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This Section Considers the following documents under consultation:

1. [Housing Needs Update September 2020 \(EX/CYC/43a\)](#)
2. [York Economic Outlook December 2019 \(EX/CYC/29\)](#)

- 2.1 It has been LDP's consistent position throughout their representations to the emerging Plan that it does not plan for an appropriate level of housing and that the housing need for the city is substantially higher than that targeted in the emerging Plan.
- 2.2 The level of planned housing is contradictory to the indicators of housing need in the City, where there is an evident increasing affordability gap, growing need for affordable homes and a strategic aim of growing the City's economic base.
- 2.3 The case made on behalf of LDP in their representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) still applies, although LDP make the following observations on the latest information submitted by CYC.
- 2.4 Whilst it is noted that housing need was discussed at the Examination in December 2019, to date the Inspectors have not expressed any particular view on housing need in the City, other than to request CYC's views on whether the ONS published 2018 based household projections represent a meaningful change ([EX/INS/16](#)), and directing ([EX/INS/17](#)) CYC to consult on their Housing Needs Update ([EX/CYC/43a](#)) published almost a year ago. It is LDP's case that basing the City's planned housing growth on the approach adopted in NPPF1 is untenable in the case of York, where the Plan was submitted 4 years ago, all indications of housing need demonstrate a growing housing problem (affordability, delivery, out migration, limited affordable housing delivery), and CYC where need to set an enduring Green Belt for the first time),

## [Housing Needs Updated September 2020 \(EX/CYC/43a\)](#)

- 2.5 Leaving aside the methodological concerns that have been identified by Understanding Data which are outlined below, in previous housing needs assessments by CYC's evidence ([EX/HS/M2/OAHN/0](#)), and which have been carried forward in the latest Housing Needs Assessment ([EX/CYC/43a](#)), it is notable that the evidence which CYC are presently consulting on is almost a year old and does not reflect the latest housing data (produced by ONS). Consequently, it is already out of date.
- 2.6 **Appendix 1** provides a critique (by Understand Data) of both of these documents. It finds the following:
- 2.7 It is LDP's view that basing the housing need on an aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

- 2.8 CYC's latest evidence reinforces the wider concerns raised previously by LDP at the Examination in December 2019, namely that the evidence is being used to fit a lower growth narrative. As such this does not align with the current housing need in York, the worsening affordability issues, nor does it reflect the strong employment performance of the local labour market, or the key economic investments planned.
- 2.9 Contrary to the Plan's evidence, CYC acknowledges the scale of the City's housing crisis and severe unaffordability. The Housing Need Update ([EX/CYC/43a](#)) chooses not to update on these issues, and the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.
- 2.10 This is somewhat hidden behind an "either/ or" argument that because there is an economic uplift the affordability uplift is not necessary. PPG1 does not specify that only one adjustment needs to be made.
- 2.11 In terms of employment and economic growth (set out in [EX/CYC/29](#)) the HNU ([EX/CYC/43a](#)) is out of date, being produced pre Covid and pre Brexit, and the findings are flawed in two main respects. They do not:
- Explain why York's employment performance would shift from the recent strong growth to a much lower level.
  - Factor in the scale of the positive policy on investments and projects that York has, and which would lead to growth above recent employment trends.
- 2.12 The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.
- 2.13 Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.
- 2.14 There is a circularity to CYC's case. Understanding Data suggest that current evidence and previous submissions show that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out their latest view of the York's future economy, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced, and which continues to be supported by CYC. The major impacts of York Central for example do not appear to influence the calculations of housing need.
- 2.15 While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

- 2.16 While the impacts of Covid are still to be fully understood, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand arising from further economic growth.
- 2.17 Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply the Standard Method calculated housing figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.
- 2.18 Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
- 2.19 The emerging Plan's evidence and ultimately housing need assessment and housing target do not reflect:
- The need to address the trend of slowing demographic growth.
  - Increasing unaffordability, rents and house prices.
  - An increasingly ageing population.
  - No significant additions to the local affordable stock (once RTB considered)
  - A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
  - The clear intention of the Government approach to housing provision – which is to boost supply.
- 2.20 The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.
- 2.21 In summary, the evidence demonstrates a meaningful change given the demographic changes York is experiencing, the housing market pressures and the economic growth potential of the area. This is contrary to the guidance in PPG1, which, require household projections to be adjusted in certain circumstances<sup>7</sup> and that any meaningful change should be addressed<sup>8</sup>.
- 2.22 In summary, basing the housing need on a now aged and out of date methodology is not appropriate and will simply compound a growing problem with housing delivery in the City. This matter is considered below.

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<sup>7</sup> PPG1-1D:2a-015-20140306

<sup>8</sup> PPG1-1D:2a-016-20150277

## The Transitional Arrangements

- 2.23 It has already been mentioned in Section 1 that it is highly unlikely that the Government had intended for the transitional arrangements to extend under such a prolonged period that prevails in York. If the Inspectors support the emerging Plan and its soundness, it will not be adopted for at least four years post the cut off period for the transitional arrangements. Consequently, the emerging Plan will be based on approach to identifying housing need that will be over 10 years old and which has been updated on two separate occasions since.
- 2.24 The consequence in the case of York, where the Green Belt is being set for the first time, will result in a short term planning policy strategy which will need to be reviewed in the immediate future. This will mean that the Green Belt will not be established for an enduring period required by NPPF1 (and NPPF2), and will need an early review, soon after it's adoption.

## Standard Methodology

- 2.25 In 2018, the Government introduced a new approach to calculating local housing need, through the standard methodology (SM1). The purpose was intended to simplify and speed up the planning process, whilst ensuring that sufficient housing was delivered through the Country to meet the Government's national housing targets.
- 2.26 There were, however, weaknesses in SM1 and, consequently, the Government reviewed the formula of SM1, and introduced a new standard methodology (SM2) in 2020. SM2 is very similar to SM1, although with a fundamental modification to top up the undersupply that resulted from SM1 by identifying the 20 largest Cities and urban areas to increase their supply by 35% (above the figure shown by SM1).
- 2.27 York is not one of the 20 largest Cities, although the SM2 clearly demonstrates a significant uplift in housing requirements in the City, beyond that being suggested by GL Hearn ([EX/CYC/43a](#)). CYC's housing need under SM2 is 1013 d.p.a, i.e. 25% more than the emerging Plan is seeking to promote.
- 2.28 Adopting SM2 of NPPF2 demonstrate that a much greater housing need prevails in York. This is not simply an academic demonstration of housing need in York by reference to SM2, but more so, is supported by what is happening in York, i.e., where there is an increasing affordability gap and growing need for affordable homes that is simply not being met.
- 2.29 Therefore, whilst the emerging Plan is being assessed for its soundness under the transitional arrangements (and by reference by NPPF1) the circumstances of York clearly demonstrate this is not appropriate and as it simply suppresses the true housing need. Given the emerging Plan's examination has been delayed since it was first submitted, and over 18 months have passed since the first examination sessions were held, there are strong grounds to argue that it is not appropriate to base housing need on a now aged and out of date methodology.
- 2.30 The consequence of such is that the true housing need of the City will not be met by this emerging Plan, and this is further compounded by the evident suppression of the OAN even adopting the methodology of NPPF1.

## Summary

- 2.31 In summary, it is demonstrated that CYC's latest assessment of housing need (September 2020) , underestimates the City's housing need, and that there is a meaningful change in the housing situations even adopting the aged, and arguably inappropriate (given the circumstances of York), methodology of NPPF1.
- 2.32 Moreover, the housing requirement that results from the NPPF1 methodology is significantly below (25%) the required provision of SM2 (NPPF2).
- 2.33 Whilst the soundness of the emerging Plan is being assessed against the NPPF1, given that there has been a significant delay in the examination of the emerging Plan (and which is likely to extend into 2022) and it is possible the emerging Plan will not be adopted to 2023 assessing this emerging Plan under the transitional arrangements is simply not appropriate, especially in the case where the Green Belt is being set for the first time, and that boundary must be set for an enduring period.
- 2.34 In view of this, there are strong grounds for the emerging Plan's housing provision target to be based on the latest SM2 for determining housing need (and delivery).
- 2.35 We note that the Inspectors Examining this emerging Plan have, to date, not expressed any particular view on the housing needs evidence, other than requesting CYC update their housing need assessment ([EX/HS/M2/OAHN/0](#)), which has resulted in CYC commissioning the work published last September ([EX/CYC/43a](#)). We strongly urge the Inspectors to recognise that in the above circumstances it is in the interests of sustainable planning for the appropriate level of housing provision to set the emerging Plan's housing provision based on SM2.

# Housing Supply

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This Section Considers the following documents under consultation:

1. [Strategic Housing Land Availability Assessment Update \(April 2021\)](#) (EX/CYC/56)
2. [CYC Annual Housing Monitoring and MHCLG Housing Flow Reconciliation Return 2019](#) (EX/CYC/32)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update](#) (EX/CYC/59i)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 7 Housing Supply Update Trajectory](#) (EX/CYC/59j)
5. [Affordable Housing Note Final February 2020](#) (EX/CYC/36)

3.1 This Section considers the following matters:

- 3.1.1 Housing delivery since the start of the Plan Period. Notably, it demonstrates that housing delivery has been low, and at a much lower rate than the housing need (measured either by reference to NPPF1 or the SM2).
- 3.1.2 The housing supply and how that compares to the housing need and an extended Plan Period (See Section 1, and an explanation of the need to extend the Plan Period in Section 4).
- 3.1.3 The appropriateness of the proposed trajectory suggested by CYC for ST15, given previous representations by LDP ([EX/CYC/21b](#) (pages 2187-2328) and [CD014G](#) (pages 358-1059)) which demonstrated that the trajectory was overly ambitious, and it remains LDP's position that the latest trajectory ([EX/CYC/59j](#)) is unachievable and, therefore, unsound.
- 3.1.4 The trajectory for both open market and affordable housing in relation to ST15, and demonstrates that it is unachievable.

## Delivery of New Homes

3.2 The SHLAA Update (April 2021) ([EX/CYC/56](#)) as well as CYC's Housing Trajectory ([EX/CYC/59j](#)) suggested that there were 2,409 net housing completions over the three-year period of 2017/2018 2018/2019 and 2019/2020. Notably, these also correspond with the MHCLG data reported for the same three years<sup>9</sup>.

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<sup>9</sup> Housing Flow Reconciliation Document ([EX/CYC/32](#)).

3.3 The completions are show in **Table 3.1** below:

Table 3.1: Housing Completions

Year	Housing Completions	Communal/Student Completions	Total Completions
17/18	1,296	35	1,331
18/19	449	2	451
19/20	560	67	627
Total	2,305	104	2,409

- 3.4 Both [EX/CYC/56](#) and [EX/CYC/59i](#) break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). It is, therefore, suggested in both documents that the delivery of student accommodation is low (i.e., just 4.3%). This is, however, a significant misrepresentation of the true picture of purpose-built student accommodation (PBSA) delivery, which is substantially greater. In fact, during the three-year period, 35% of all completions (i.e. 820<sup>10</sup> of the 2,409 units) were student/communal accommodation<sup>11</sup>.
- 3.5 It is recognised in the latest PPG<sup>12</sup> that the inclusion of student housing should not be automatic and is only accountable where new student housing releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation.
- 3.6 There has been a significant growth in the student population in York which is projected to continue<sup>13</sup> and, therefore as such, it cannot simply be assumed that additional student accommodation should count towards meeting general housing requirement. The PPG1 notes that LPAs should plan for sufficient student housing, and that PBSA can take pressure of private residential sector in increase overall housing stock, although that requires an understanding of student accommodation requirements<sup>14</sup>;the evidence supporting the Plan does not have the level of understanding to determine whether more PBSA would result in the release of traditional housing stock.

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<sup>10</sup> The AHMRs demonstrate that in 2017/2018 637 of the 1,296 net housing completions (ie, 49.2%) were private managed student accommodation. Similarly, in 2018/2019 40 of the 449 net housing completions (ie, 8.9%) were student accommodation, and in 2019/2020 39 of the 560 net housing completions (ie, 7%) were student accommodation.

<sup>11</sup> The Annual Housing Monitoring Report (AHMR) appended to the SHLAA (Appendix 2 of [EX/CYC/56](#)).

<sup>12</sup> PPG2 – Paragraph: 034 reference ID: 68-034-20190722.

<sup>13</sup> Higher education Student Statistics UK:2019 to 2020

<sup>14</sup> Paragraph 021 reference ID:2a-021-20160401

- 3.7 In view of the above, the delivery of traditional housing over the past three years is much less than reported in CYC's evidence. Over the three-year period, there has been delivery of only 1,589 net additional homes, excluding student accommodation, i.e., only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own assessment, of 1013 over SM2).. This is during a period when there has been a strong housing market, which clearly indicates a major constraint on housing land supply in York.
- 3.8 The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply ([EX/CYC/59i](#)).

### Housing Delivery Pre-2017 (i.e., Inherited Shortfall)

- 3.9 The CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 ([EX/CYC/32](#)) demonstrates a significant difference in delivery of net additional dwellings. For York, the difference between MHCLG's housing delivery data and CYC's own data is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017.
- 3.10 Whilst [EX/CYC/32](#) seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG.
- 3.11 The consequence of this mis-alignment would be to add to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory. This is compounded by the "inherited" shortfall adopted in CYC's Housing Needs Assessment<sup>15</sup> which assumed that there was an inherited shortfall of only 518 units to be carried forward into the plan period.

### Housing Supply

- 3.12 LDP do not comment on the efficacy of the housing land supply stated within the SHLAA. However, the following observations are relevant to these representations.
- 3.13 There is a recognised finite supply of housing land within the existing urban boundary of York ([EX/CYC/59i](#)), and housing development is competing with a range of other land uses. Opportunities to increase housing supply from the urban area of York are, therefore, limited.
- 3.14 The above is demonstrated in [EX/CYC/59i](#). This document demonstrates in the York's urban area that the supply of housing land in 2017 was merely 12,110 homes during the period 2017-2038 (Table 3 of [EX/CYC/50](#)). In comparison, the assessment of housing land supply in the urban area (as reported in [EX/CYC/59i](#)) suggests that there is now a reduced supply of only 11,747 (taking account of completions that have taken place between 2017-2020) which, as noted previously, also includes a high proportion of PBSA.

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<sup>15</sup> The updated Housing Trajectory (2019) ([EX/CYC/16](#)).

- 3.15 In view of the above, once account has been made for the significant PBSA delivery (820 units) it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints that exist in York.
- 3.16 [EX/CYC/59i](#) suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses (see Table 5) during the period 2017 – 2038. This shortfall clearly is to be accommodated outside the urban area of York.

- 3.17 For the reasons that have already been outlined in Section 2, LDP consider that the housing target underpinning the emerging Plan is not sound where assessed against NPPF1. More so, given the passage of time and the need to ensure that the emerging Plan has an enduring Green Belt, it would be appropriate to reflect the housing need in SM2. Furthermore, the Plan Period should be extended to 2038, and a further period of a minimum of five years should be adopted to ensure an enduring Green Belt.
- 3.18 In light of the above, it can be seen in **Table 3.2** below the difference in housing supply shortfall between that reported in [EX/CYC/59i](#) and that which would arise under SM2 calculation.

**Table 3.2: Housing Supply (Urban Area) 2017-2038**

Housing Supply 2017-2038	Housing Position Reported in <a href="#">EX/CYC/59i</a>	Housing Position in Situation SM2	Supply adopting
Total housing requirement	14,693	18,864	
Total housing supply (urban area)	11,747	11,747	
Shortfall	2,946	7,117	

Notes:

1. Allowing for completions of 2409 dwellings between 2017-2020

- 3.19 It is noteworthy that the “Shortfall” in Table 3.2 is skewed by the significant level of PBSA which has been delivered in the past 3 years, and the likely underestimate of the inherited shortfall. Accounting for these will increase the shortfall further. Furthermore some of the allocations close to Strensall Common SPA may need to be reduced in capacity as a consequence of the findings of the HRA ([EX/CYC/45](#)). The HRA demonstrates that the potential for pressure from the large allocations in the north of the City (such as ST8 and ST14) may need to be reduced in relation to their housing delivery.
- 3.20 It is evident from the above that the housing land supply within the City is highly constrained without Green Belt release, even on CYC’s own flawed approach to assessing housing need. If the SM2 is adopted the scale of housing need beyond the urban area is, therefore, much greater.

## Trajectory for ST15

- 3.21 In the representations to the Proposed Modifications (June 2019), LDP demonstrated that the housing delivery trajectory for ST15 was overly ambitious, even if the allocation was proven to be deliverable (which LDP consider it is not). This was primarily on the basis that delivery of ST15 was affected by the fact that the proposed A64 junction would need to be in place prior to the delivery of any homes. On the basis that there is no other proposed access to ST15, and that those access works could take in the order of 5-6 years to be delivered<sup>16</sup>, it is clear that delivery of housing on ST15 would be considerably delayed compared to CYC's assumptions.
- 3.22 Whilst in CYC's latest trajectory ([EX/CYC/59i](#)) housing delivery for ST15 has been pushed back to year six of the Plan Period (i.e., 2022/2023) this still remains overly ambitious and in LDP's views highly unrealistic. This is on the following basis:
- 3.22.1 As currently drafted, there is intended to be only a single point of access to serve ST15 (i.e., of the A64) and this would require the delivery of a significant piece of infrastructure which, from a new junction or for the reasons outlined above, would take some considerable time to deliver, even if funding from external sources could be found.
- 3.22.2 There is no planning permission in place and there is no planning application in the offing.
- 3.22.3 It is unlikely that the emerging Plan will be adopted until 2023.
- 3.23 There is, therefore, no prospect of housing delivery on ST15 by 2023.
- 3.24 In the alternative, Langwith can be accessed from Elvington Lane, is capable of delivering housing at it's eastern end in the short term, subject only to planning consent Avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction.
- 3.25 **Appendix 5** of LDP's representations to the City of York Local Plan Proposed Modifications (June 2019) ([EX/CYC/21b](#)) showed a trajectory for Langwith, which suggested that if the emerging Plan was adopted in 2020, allowing an appropriate time for planning consent to be granted (i.e., by 2021), the delivery of housing would begin in 2022 and there would be a build up of delivery as the site's infrastructure is put in place. The delivery trajectory previously presented to the examination representations is reproduced at **Appendix 2**. Row 4 shows the delivery trajectory for Langwith, compared to ST15 (assuming it was deliverable) at Row 3.
- 3.26 Whilst the delivery trajectory for Langwith has now changed given the delay in the emerging Plan, and assuming that the emerging Plan is not adopted until 2023, the delivery trajectory would be delayed by three years This is demonstrated in **Appendix 3**. This also demonstrate

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<sup>16</sup> This does not account for a 5 year moratorium of development of ST15 imposed by the biodiversity obligations of criterion (vii) of Policy SS13.

the delayed delivery trajectory for ST15. It is shown that Langwith delivers at a much quicker rate than ST15, could do, if it is proven deliverable and viable.

## Affordable Housing

- 3.27 LDP made representations during the examination that CYC's delivery of affordable housing has been low. It is clear from CYC's evidence that there is a strong imperative to deliver new affordable housing at a significant level in order to address affordable housing need.
- 3.28 In previous representations to the emerging Plan ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) LDP demonstrated that Langwith has the potential to deliver over 1,000 affordable homes.
- 3.29 [EX/CYC/56](#) (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, for the reasons outlined above, the trajectory for housing delivery, which has consequent impacts on affordable housing delivery, is overly ambitious and unrealistic and, therefore, this trajectory purported in [EX/CYC/36](#) is unrealistic. The re-run trajectory in **Appendix 3** demonstrates that ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, the same Appendix demonstrates that affordable housing delivery at the rate previously assumed for Langwith would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
- 3.30 It is clear that Langwith, or a variation of Langwith, will deliver a significantly greater level of affordable housing than would be achievable on ST15, Which would be more reliable and predictable .This is important in the case of York where there is a growing affordability gap.

## Summary

- 3.31 .It is clear that housing land supply in York's urban area is finite, and delivery constrained (i.e. the delivery of housing in the City has been low despite strong market conditions over the past 3 years). Even on CYC's flawed OAN, the need to satisfy the City's housing need outside the urban area is substantial during the Plan Period, and the period beyond (to allow for an enduring Green Belt). If the OAN is updated (**Appendix 2** of [EX/CYC/21b](#) and **Appendix 1** of this report) then that unmet need increases, as it does if SM2 is adopted and will need to be met outside the City's urban areas.

# Green Belt Matters

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This Section Considers the following documents under consultation:

1. [Topic Paper 1 Approach to defining Green Belt Addendum January 2021 \(EX/CYC/59\)](#)
2. [Topic Paper 1 Green Belt Addendum January 2021 Annex 1 Evidence Base \(EX/CYC/59a\)](#)
3. [Topic Paper 1 Green Belt Addendum January 2021 Annex 5 Freestanding Sites \(EX/CYC/59g\)](#)
4. [Topic Paper 1 Green Belt Addendum January 2021 Annex 6 Proposed Modifications \(EX/CYC/59h\)](#)
5. [Audit Trail of Sites 35 to 100 Hectares \(EX/CYC/37\)](#)

## Extending the Plan Period

- 4.1 This Report has already highlighted that by the time the emerging Plan is adopted, a considerable part of the plan period (i.e. over a third) will already have expired, as a consequence of the protraction of the emerging Plan's examination. It is likely that by the time the emerging Plan is adopted, assuming the Inspectors find it sound, there will only be circa ten years remaining of the Plan Period. This is contrary to the advice of NPPF1 (and NPPF2) which recognises that strategic policies should endure for a period of at least 15 years.
- 4.2 For the above reason, there are clear grounds to extend the Plan Period to 2038.
- 4.3 It is helpful that CYC have already presented a delivery trajectory in relation to housing land to 2038 and this is a clear basis for understanding the need for any additional housing beyond that which is currently allocated within the emerging Plan.

## Enduring Green Belt Boundary

- 4.4 It has been demonstrated previously that in order to provide permanence to the Green Belt boundary, it is necessary for it to endure beyond the plan period.
- 4.5 At present, CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period ([EX/CYC/50](#)). CYC do not intend to "safeguard" land as part of this emerging Plan and, therefore, it is necessary to ensure that allocations have sufficient capacity to meet the future development needs, for a period beyond the Plan Period.

- 4.6 Given the delay in the emerging Plan's examination it is appropriate and sound to extend the Plan Period to 2038. Consequently, in order to ensure an enduring Green Belt boundary, it is necessary to ensure that the same boundary accommodates development beyond 2038, and LDP consider that this should be no less than five years. This would give a 25-year period from the start of the Plan Period (2017-2043).
- 4.7 It is notable from CYC's housing trajectory ([EX/CYC/59i](#)) that there are three sites identified for delivery of new homes post 2038. These sites include York Central (ST5), Land to West of Elvington (ST15) and Imphal Barracks, Fulford Road (ST36).
- 4.8 LDP do not comment specifically on the trajectory of the sites other than ST15 (see Section 3 for the commentary on the trajectory for ST15).
- 4.9 The totality of the capacity of ST5 and ST36, post 2038 is limited to 572 homes. This would represent only one year's supply against CYC's assessment of their annual housing need ([EX/CYC/43a](#)). It would be much less than the annual housing need identified by SM2 (which is 1013 dwellings).
- 4.10 It is clear from CYC's trajectory, that if the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land. It is the case of LDP that Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing draft allocation (ST15).

### **The Approach to delivering the Green Belt Compactness ([EX/CYC/59](#))**

- 4.11 CYC have sought to clarify the Green Belt methodology and the approach to defining Green Belt ([EX/CYC/59](#)), and LDP have the following observations on the methodology, including the concept of compactness.
- 4.12 CYC clarify in [EX/CYC/59](#) that of the five Green Belt purposes, Purpose 2 and Purpose 5 are of less relevance to York, and that Purpose 4, (historic character and setting of York), 1 (prevents sprawl) and 3 (protecting the countryside from encroachment) are appropriate in examining the general extent of the Green Belt and justifying the detailed Green Belt boundaries see (see paragraph 5.10 of [EX/CYC/59](#)).
- 4.13 CD103 and [EX/CYC/59](#) recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself, and not the surrounding settlements.
- 4.14 Section 8 of [EX/CYC/59](#), which deals with defining the boundary of the Green Belt and the "key drivers" for such, prays in aid of the Heritage Topic Paper ([SD103](#)). It recognises the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not purport to require all land to remain permanently open in the administrative area of York, as not all land contributes to its setting.

- 4.15 Whilst [SD103](#) demonstrates that the compactness of York is an important heritage characteristic, this relates to the York settlement itself as outlined above. Notably, this relates to the concentric form of the main urban area (paragraph 8.20 of [EX/CYC/59](#)) which is a bi-product of the history of York (and, in particular, was a factor in creating a defensible City). This historical form of a densely populated urban core, close to open areas which lead out into the wider countryside is a key historic characteristic of the City. This is confirmed in the [EX/CYC/59](#) at paragraphs 5.20 and 5.40.
- 4.16 However, the concentric nature of the City itself is not reflected in the smaller settlements that surround York. In fact, these settlements are more linear in form, and are a notable characteristic of North Yorkshire villages. This is evidenced in **Figure 4.1** below.



- 4.21 More so, the need for housing should be based on a much higher need, and LDP respectfully suggest for the reasons outlined in this Report that housing need should be through reference to the SM2 figure rather than the outdated NPPF1 requirement figure (leaving aside the view that CYC's assessment is in any event too low).
- 4.22 Furthermore, the allocation needs to show that it is viable and deliverable<sup>17</sup>, although at this stage is expected that the Inspectors will only be able to fully judge this matter later in the examination of this Plan when it comes to site specific considerations.

## Assessment of the New Green Belt Boundary for a New Settlement in the South East of York

- 4.23 As part of the previous Representations by LDP ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) demonstrated the appropriateness of Langwith in relation to the setting and defining of a strong Green Belt boundary. This assessment adopted the Council's proforma approach that had been used by the Council in their previous Green Belt analysis ([TP1](#) and [EX/CYC/18](#)). Following the recent clarifications to the methodology and the approach to defining Green Belt boundaries ([EX/CYC/59](#)), Quod have reviewed their previous analysis (contained in LDP's Representations at ([EX/CYC/21b](#) (page 2187-2328) and [CD014G](#) (pages 358-1059)) and adopted the same approach as contained in [EX/CYC/59g](#) to demonstrate how Langwith performs against CYC's clarified assessment. This is contained at **Appendix 4**.

## Evidence of ST15

- 4.24 Whilst LDP do not wish to make any specific comments on the audit trail of sites (35-100 ha) ([EX/CYC/37](#)) specifically, this document is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment ([EX/CYC/62](#)) and the evidence presented by LDP as part of the previous reports, it is clear that Langwith is a sustainable allocation.

## Summary

- 4.25 It is important for the emerging Plan to set a Green Belt boundary that endures beyond the Plan Period, and which is capable of meeting the City's development needs beyond that period.
- 4.26 The Plan Period needs to cover a period of at least 15 years, and given that 6 years of the Plan Period is likely to have expired by the time this emerging Plan is adopted, then the Plan Period should be extended to 2038.
- 4.27 Given the scale of housing need that is to be addressed, it is important that sufficient land is allocated outside York's urban area to meet the need that will arise within the timeframes relevant to the emerging Local Plan given the finite supply in the City itself due to the heritage constraints.

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<sup>17</sup> Paragraph 1.73 of NPPF1

- 4.28 The Green Belt methodology clarifications in [EX/CYC/59](#) refers to the concept of “compactness” in the case of development within York itself. Whilst it is mentioned in relation to the existing villages (and freestanding new settlements proposed), this concept is however one of ensuring self-containment rather than necessarily a concentric form of development. A concentric form of development is only relevant in that case of the City of York’s urban area itself due to it’s historic development patterns.
- 4.29 In assessing the Green Belt boundary of the new settlement in the south east of York, it is demonstrated that Langwith (or a variation of it) would satisfy the three key purposes for setting York’s Green Belt (i.e. purposes 4,1 and 3).

# Sustainability (Including HRA and SFRA)

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This Section Considers the following documents under consultation:

1. [Strategic Flood Risk Assessment](#) (EX/CYC/61)
2. [Habitats Regulations Assessment 2020](#) (EX/CYC/45)
3. [Habitats Regulations Assessment 2020 Appendices](#) (EX/CYC/45a)
4. [Sustainable Appraisal of the Composite Modifications Schedule \(April 2021\)](#) (EX/CYC/62)

## HRA

- 5.1 In reviewing the HRA, and the supporting Sustainable Appraisal ([EX/CYC/45](#) and [EX/CYC/62](#)) respectively LDP note that ST15 will have no adverse effect Strasall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10).
- 5.2 Notably, LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area, although for the reasons outlined in (previous representations to the Regulation 19 Plan) it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place.
- 5.3 This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI).
- 5.4 It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it. Notably, development of a new settlement in this area, either as currently drawn (ST15, or Langwith) is capable of being appropriately mitigated.

## Strategic Flood Risk Assessment

- 5.5 LDP's engineers have reviewed the SFRA, and there are no specific comments to make on its findings, other than to note that it concludes that there are no strategic sites that are within Flood Zone 2 and 3 that are not capable of being delivering from a flood risk / drainage perspective. Whilst the SFRA suggests that ST15 includes a small area of Flood Zone 2 and 3, this in the very northern extremity of ST15 and previous more detailed flood modelling in support of earlier representations showed this is less extensive than suggested by the high-level mapping in the SFRA. Furthermore, any limited localised flood risk within ST15 is entirely capable of being mitigated through careful masterplanning in those areas, especially given that there is an anticipation of a significant level of open space within the allocation. This would similarly apply to the Langwith proposals.

# Proposed Modifications

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This Section Considers the following documents under consultation:

1. [Composite Modifications Schedule April 2021](#) (EX/CYC/58)

6.1 LDP comment as follows on the specific Polices and their Proposed Modifications.

## Whole Plan Reference Change – “Post Plan Period” and “Plan Period” (CYC’s PM47 and PM48)

6.2 In light of the need to extend the “Plan Period” to 2038 and a minimum period of five years thereafter for the “Post Plan Period” for enduring Green Belt purposes, it is respectfully requested that the Plan Period and Post Plan Period are clarified as being:

- Plan Period – 2017-2038
- Post Plan Period – 2038-2043

6.3 The above changes should be traced throughout the emerging Plan.

## Policy SS1 (CYC’s PM49 – PM 55)

6.4 In light of the Representations and observations in the previous Sections of this report, and previous evidence by LDP, we respectfully request the following modifications to Policy SS1:

6.4.1 Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017).

6.4.2 In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043).

6.4.3 Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on SM2.

6.4.4 Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038.

6.4.5 To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years).

6.5 In conjunction with the above, corresponding changes are necessary to the Explanation of the Policy.

## Policy H1 (CYC's PM62 – PM65)

- 6.6 In light of previously Representations and matters reconfirmed in these Representations, the allocation of ST15 should be modified, including increasing its site size estimated yield) and estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan).
- 6.7 In light of the above, subsequent changes will be required to the Explanation to the Policy.

## Policy SS13 (PM9, PM10 and PM11)

- 6.8 We respectfully request that the amendments to Policy SS13 previously suggested by LDP should be adopted ([EX/CYC/21b](#) page 2212). Notably and specifically in relation to the matters previously being consulted upon the following matters should be included within the Proposed Modifications ([EX/CYC/58](#)) in relation to SS13:
  - 6.8.1 Increase the housing yield, and delivery trajectory in the first part of the Policy.
  - 6.8.2 Extend the boundary of the allocation to match that of Langwith.
  - 6.8.3 Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures "*five years prior to the commencement of any development*".
  - 6.8.4 Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
  - 6.8.5 In respect of the Proposed Modifications (Pm9, 10 and 11), LDP make no comments.



## Appendix 1

### York Housing Need 2021 Update (Understanding Data)

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## YORK HOUSING NEED 2021 UPDATE

York's Council Plan states:

“Currently, York's housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

York has experienced:

A considerable slowing of population growth, likely linked to the factors below.

It costs from 35% for a 1 bed to 42% more to rent a property in York than the regional average.

Total rental costs range from £8,000 to £16,000 (1 and 4 or more bed) per annum.

There has been a net gain of 3 rented affordable stock, (2013-20) from 480 Right to Buy losses and 483 additional affordable rented stock.

House prices in York are the 2<sup>nd</sup> highest in the Yorkshire and Humber region, and the 3<sup>rd</sup> highest across the 72 LAs of the northern regions.

It is however performing well across a range of economic indicators and has ambitious and transformational plans for further economic growth. These prospects are not reflected in the evidence behind the Local Plan.

For Langwith Development Partnership in support of representations on the City of York NEW LOCAL PLAN PROPOSED MODIFICATIONS AND EVIDENCE BASE CONSULTATION



UNDERSTANDING DATA

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Part 1 Demographic slowdown

Part 2 Housing market trends - worsening affordability.

Part 3 Economic position and prospects

Part 4 Comments on EX/CYC/29

Part 5 Comments on EX/CYC/43a

## Background

1. Understanding Data were asked by Langwith Development Partnership to comment on the latest evidence the City of York Council are relying on to underpin their Housing target and the associated understanding of housing need, and related housing market pressures, demographic change and economic prospects in York.

2. The two main documents that are reviewed are:

EX/CYC/29 Economic Outlook &  
EX/CYC/43a Housing need update

3. These are part of the current City of York New Local Plan Proposed Modifications and Evidence Base Consultation running from Tuesday 25 May and Wednesday 7 July 2021.

4. Understanding Data has prepared previous supporting evidence and document review, included as part of Langwith Development Partnership's submissions and Examination appearance in Dec 2019:

### UNDERSTANDING HOUSING NEED IN YORK

A critique of 2019 Housing Needs Update by GL Hearn for City of York Council, a review of Local Plan examination findings over the use of the 2016 based household projections, and an alternative recommendation for the City of York Local Plan OAN.

This was attached as Appendix 15 Review of CYC's OAN which was part of the QUOD (378) representations to the Submission Plan consultation in 2018.

5. This paper does not repeat all previous arguments made in the 2019 work, but updates with the latest available data for context and provides commentary on the evidence. In part this is because the previous evidence relied on by the City of York Council is still live, due to the partial nature of the latest evidence that the Council relies on. Reference is made to key issues raised previously, especially in the light of the latest data.

6. The partial rolling forward of some aspects of the Council's evidence case makes the paper trail of what is relevant hard to follow, at times.

Understanding Data has been trading since 2015, and has supported Councils with demographic, housing and economic analysis and advice throughout the Local Plan process and at examination at Bradford, Cornwall, East Devon, Basingstoke and Deane, North Tyneside, Fylde, Barnsley, Welwyn Hatfield, Leeds, Mid Devon and the Isles of Scilly.

In addition, a range of evidence and written and verbal appearances and submissions around Local Plan evidence papers has been provided for a range of private sector clients as part of the plan process or examinations in Warwick, Harrogate, South Kesteven, East Lindsey, Mid Sussex, Stroud and Newark & Sherwood, and in support of community groups at: Tandridge & North Essex.

Understanding Data has provided expert input to wider project teams for relevant housing research projects (Leeds SHMA, Isles of Scilly SHMA, Swansea SHMA,) and provided focused SHMA updates and evidence support, and advice for the Isles of Scilly Council.

Robin Miller, founder of Understanding Data was previously the Corporate Research Lead for Cornwall Council (2009-15)

## Introduction

Clearly there is a wealth of overlapping evidence that sits behind the York plan at this stage in the process. This paper does not look to repeat previous critique in detail although does summarise some previously made comments, to show that some of these concerns have been consistently raised at earlier stages.

What makes this less the last two pieces of Housing Need evidence are only partial in scope and draw on even earlier work. The origin of the current expression of housing need draws upon several stages of GL Hearn concluding and the Council accepting that new evidence supports past work and makes no practical difference to previous conclusions.

However, those conclusions are based on selective consideration of some of the latest evidence and does not attempt to “join the dots” between three linked issues, only one of which is addressed in EX/CYC/43a, and even then, in passing. These three issues are that:

York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind

Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. This is not investigated in EX/CYC/43a and in EX/CYC/9 it was acknowledged that market signals were worsening and justified an uplift. (EX/CYC/9 Para 4.29). However, because the demographic changes have not been investigated in either GL Hearn report, there is no analysis or investigation as to the extent these two factors are linked. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc.

The economic evidence remains flawed and partial. EX/CYC/29 is a document released during the examination hearings in 2019. There is no confirmation that it informs the York Economic Strategy that is under preparation, and it undermines the housing need case, as it projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. However, the approach in EX/CYC/29 is flawed for two reasons. It does not adequately capture stronger employment generation in recent years, and it still does not adequately capture the boost to local employment that projects like York Central will have.

For these reasons this reports starts by reviewing recent trends under these three headings:

- Demographic slow down,
- Worsening affordability
- Economic prospects

It then considers in detail issues contained in both EX/CYC/29 and EX/CYC/43a, before offering pragmatic conclusions that reflect that. ID2a-015015 and 016 which say that local plans should be informed by the latest data and also that, what matters with new data is whether there is a meaningful change.

There have been meaningful changes and the Plan's evidence is ignoring these. We also acknowledge that there is always going to be new data available. The issues we raise in this report however, are only confirmed by data that has become available since September 2020 (the publication of EX/CYC/43a) – they are not new since that date. The demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16.

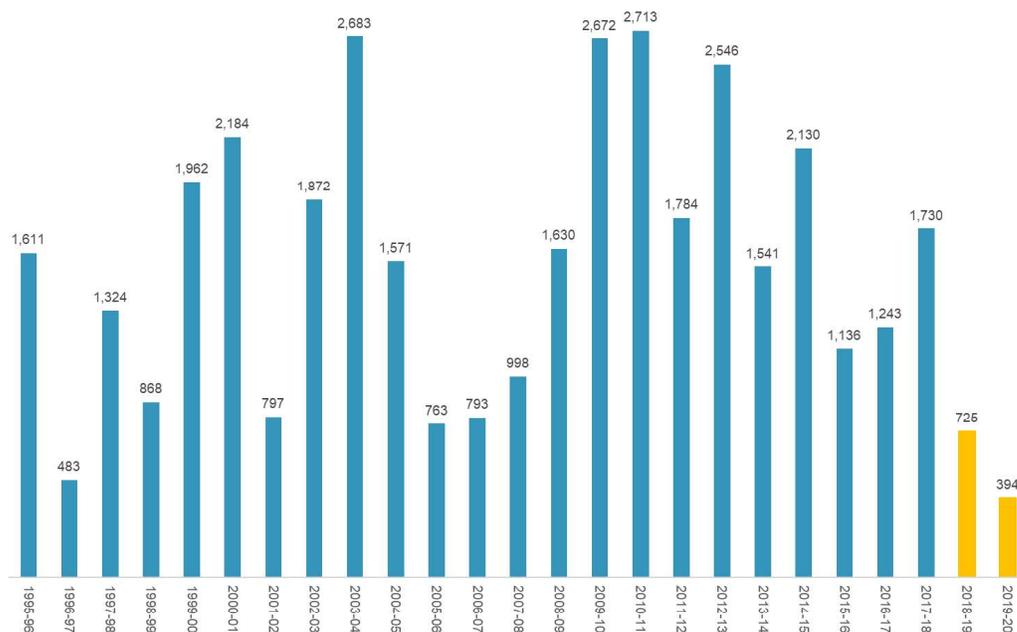
## Part 1 Demographic slowdown

7. Parts 1 to 3 of this document summarise the latest available relevant data and set out the main challenges and opportunities that the Local Plan evidence base should be responding to.

8. The City of York Council (CYC) area has an estimated population<sup>1</sup> of 210, 618 in 2019. The 2020 estimates released on 25<sup>th</sup> June 2021, show some impacts from the Covid 19 pandemic<sup>2</sup>, covering the period up to June 2020. They do not show changes to the trend of a slowdown on population growth, that has been emerging since 2011.

9. The annual population change for York is shown below.

[Figure 1. Annual Population Change York](#)



10. The population in York has grown since 1995. In six individual years, the population grew by over 2,000 people, in 2003/04, with a peak of an additional 2,683 people, and then between 2009-11 (2,672 and 2,713 people), in 2012/13 (2,646) and 2014/15 (2,130).

11. The population increase in 2018/19 was the lowest since 1996/97, at 725, and in 2019/20 lower again at 394.

12. Annual population change responds to the wider economic cycles, and is a combination of the relationship between migration, moves in and out of the area from people across the UK and internationally, and the relationship between the number of births and deaths, which in turn reflects the age structure of the area (an area with higher percentages of older people would be expected to have increasing numbers of deaths). To explain the

<sup>1</sup> Office for National Statistics Mid Year Population Estimates

<sup>2</sup> Events that affected the components of population change and that feed into the population estimates include:

- a “first wave” of deaths from the coronavirus pandemic occurred during the period up to June 2020.
- moving home within the UK became more difficult from 23 March 2020, however, many moves for study had already occurred before the pandemic.
- international immigration became more difficult, with the Foreign and Commonwealth Office advising against overseas travel from 17 March 2020.
- areas with the other populations we measure, such as prisoners or members of armed forces, had fewer people joining those populations in the months up to June 2020.

slow down in population growth in York, the following paragraphs explore both methodology (paragraphs 13-14) and recent demographic trends(paragraphs 15-27).

13. The population estimates reflect the prevailing methodology used to produce them by the Office for National Statistics (ONS). The most recent significant change was related to how internal migration moves were captured and included a change in how the movement of graduates, post graduation was assessed. These changes have had an impact on the estimation of internal migration. ONS intend in 2022 or 2023, to revise the population estimates for 2012 to 2020 to be consistent with population estimates from the 2021 Census. As part of this back series, they intend to use the improved series of internal migration estimates, that they introduced in the 2017-19 estimates. The key impacts of this methodology improvement for York were:

- The impact of changing to the new method of dealing with leavers from higher education is to reduce the netflow of internal migration for York by 254, from 592 to 338.
- The mid-2017 population estimate for York would have been 0.12% higher if the previous method for accounting for higher education leavers had been used.
- The inflow of internal migrants to York increased by 988 (6.7%) from 14,732 to 15,720 because of moving to the new Higher Education Leavers Methodology.
- The outflow of internal migrants from York increased by 1,242 (8.8%) from 14,140 to 15,382 because of moving to new Higher Education Leavers Methodology.

14. While technical, this is important as the scale of these changes do not explain in themselves, the slowdown in the growth of the York population. Other factors lie behind the this.

15. There have been some important changes to the recent components of change<sup>3</sup> for York.

[Figure 2 Summary components of change, York<sup>4</sup>](#)

	mid-2011	mid-2012	mid-2013	mid-2014	mid-2015	mid-2016	mid-2017	mid-2018	mid-2019	mid-2020
Population	197783	199567	202113	203654	205784	206920	208163	209893	210618	211012
Births	2117	2051	2044	1993	2006	1911	1861	1736	1682	
Deaths	1768	1814	1719	1846	1806	1849	1872	1826	2058	
Natural Change	349	237	325	147	200	62	-11	-90	-376	
Internal In	12768	12697	13487	13195	13029	15720	16136	16328	14948	
Internal Out	12078	11641	13124	12558	13118	15382	15937	16688	16215	
Internal Net	690	1056	363	637	-89	338	199	-360	-1267	
International In	2330	2571	2784	2963	2510	2398	2832	2799	3246	
International Out	1577	1366	1969	1603	1542	1567	1327	1665	1200	
International Net	753	1205	815	1360	968	831	1505	1134	2046	
Special	-9	47	41	-10	48	20	33	40	-20	
Other	1	1	-3	-4	9	-8	4	1	11	

16. The main changes have been due to (net) natural change and net internal migration.

17. There has been a shift from positive natural change (more births than deaths) to negative natural change (more deaths and births). This would normally represent more

<sup>3</sup> As mentioned, and as is typical as part of the post census readjustment of population estimates, the 2012-20 estimates for York are likely to be revised and adjusted in around 2022-23, which will apply the new methodology for internal migration to 2012-16, but there may be changes to the 2017-20 estimates.

<sup>4</sup> Conditional formatting used in this table – shading light to darker colours = low to high values and the left and right bars show negative and positive change respectively.

older people in the population and less young / middle aged people, who would normally be more likely to start / add to families.

18. Internal Migration trends have changed as well, with both in and out migration increasing, however, net internal migration has gone from strongly positive, +690 and +1,056 in 2011/12 and 2012/13 to a far lower net gain, with +199 in 2017/18, a net loss in 2018/19 of -360, and a net loss of -1,267 in 2019/20. This represents a -283% shift from 2013/14 to 2019/20. A net loss in this instance represents more people leaving York than moving to it.

19. International migration<sup>5</sup> has remained a key positive component of overall York<sup>6</sup> change. In fact, for 2019/20, if international migration was balanced<sup>7</sup>, the City of York population would have declined by 1,652 people. There is some evidence nationally, in 2021, of reduced level of international workers in the UK. If the net international migration gain for York changed because of these national trends, then York may well see population actually declining.

20. The available data allows for some further insight into the internal migration patterns through more detailed analysis. By comparing the internal migration flows by age for 2012/13 (the recent largest net gain) and 2018/19 (the recent lowest – and negative net) it is possible to see some key age related changes.

Figure 3 Internal Net Migration changes<sup>8</sup> – highest to lowest recent net overall compared.

	Net 12/13	Net 19/20	Change
0-4	-10	-44	-34
5-9	-20	-15	5
10-14	10	-45	-55
15-19	2830	3203	373
20-24	-1320	-2788	-1468
25-29	-300	-770	-470
30-34	-150	-160	-10
35-39	-20	-74	-54
40-44	10	-102	-112
45-49	30	-98	-128
50-54	-30	-108	-78
55-59	-50	-82	-32
60-64	10	-63	-73
65-69	60	-32	-92
70-74	10	-54	-64
75-79	-10	-11	-1
80-84	20	-6	-26
85-89	0	-16	-16
90+	10	-2	-12

<sup>5</sup> international migration in particular is estimated using multiple data sources; in England and Wales the latest data are not always available, necessitating the use of averages source Section 16

Population estimates for the UK, England and Wales, Scotland and Northern Ireland - Office for National Statistics (ons.gov.uk)

<sup>6</sup> In the period to June 2020, international migration to the UK was higher than in the previous year, in part because of an increase in students arriving to study in the UK from abroad during this period.

<sup>7</sup> Balanced here means net 0, that is in and out international migration match.

<sup>8</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/analysisofpopulationestimatestoolforuk>

21. The highlighting in the change column shows those ages where there was a reduction in the net position by age between the recent peak and the most recent year of data.

22. In 2012/13 nine (out of 19) 5-year cohorts showed a net loss for internal migration. In 2019/20 eighteen (out of 19) 5-year age cohorts showed a net loss.

23. The important changes were a large increase in the net loss of 20-24 yr. olds, but there was an increase in losses for all age groups from the age 25. For those aged 20-44, the block of younger and younger middle aged people who are often seen as the key “new” household forming ages, and who, if they lack significant equity, struggle to access finance when house prices increase. They are competing against (older) ages who are more likely to have built up greater equity in property.

24. In, out and net migration have all seen changes between 2013 and 2020.

[Figure 4 Internal In, Out and Net Compared between 2012/13 and 2019/20](#)

	In	Out	Net
0-4	-136	-102	-34
5-9	-37	-42	5
10-14	-13	42	-55
15-19	500	127	373
20-24	1548	3016	-1468
25-29	213	683	-470
30-34	133	143	-10
35-39	65	119	-54
40-44	-28	84	-112
45-49	-48	70	-128
50-54	26	104	-78
55-59	23	65	-32
60-64	-3	60	-73
65-69	-54	38	-92
70-74	40	94	-64
75-79	44	35	-1
80-84	-1	25	-26
85-89	-21	-5	-16
90+	7	19	-12

25. The 20-44 age group saw 2114 more people leaving York in 2019/20 compared to 2012/13.

26. While, as shown previously (in Figure 2) there have been increases in the overall amounts of both in and out migration, there are clear signs that there has been a shift in age related patterns of movement

27. The final component of demographic change is age. Growth rates for the working age population (16-64) and younger people (0-15) are considerably lower than the recent increases in the 65+ population. Any slowdown or, as national trends predict, fall in working age population has an impact on an area’s ability to support new employment.

Figure 5. Age Changes

	2013	2020	2013-20	%
All Ages	202,113	211012	8,899	4.4
Aged 0 to 15	32,168	32708	540	1.7
Aged 16 to 64	134,246	139430	5,184	3.9
Aged 65+	35,699	38874	3,175	8.9

### Demographic Conclusion

The slow down of population is down to three factors.

The first is methodological (paragraph 13) but represent an improvement of how ONS estimate internal migration changes.

The second is down to the age structure of the area and is in line with national trends, as population in local area get older there is an increase in the number of deaths. As births have fallen in York as well this means that natural change in York is now negative, that is more deaths than births.

The third is due to the changes in internal migration and the switch from a net gain in the early 2010s to a net loss in the last two years. Internal “in” migration has increased by 17% from 2019/20 but internal “out” migration has increased by 34%.

If York was experiencing major economic restructuring with large scale job losses, then an increase in people leaving the area (to find new work) of this scale may be a compelling explanation. York’s economic performance and employment growth, as Section 3 shows has been strong.

The age changes from the net migration data (paragraphs 20-26) highlight that the increases in out migration have been for the age groups most associated with new household formation, who are most likely to be adversely impacted when affordability worsens, and the case to adjust housing need assessments to model an increased level of household formation in this age group was commonly accepted under plans examined under the 2012 NPPF.

It is reasonable to conclude that the main factor in York’s population slow down is the increase in out migration, predominantly of younger working age people. It is equally reasonable to conclude that this is likely to be caused by the significant challenges that York’s housing market faces in terms of supply and affordability.

## Part 2 Housing Market – worsening affordability

28. The issues around the housing crisis nationally and in York are not new and have been well rehearsed. Earlier versions of the Local Plan highlighted the significant pressures facing York. It is only the more recent Local Plan evidence that, in essence down plays the seriousness of the issue by not addressing it.

29. The City of York continues to have a dramatically overheated and unaffordable housing market. The latest housing need report (EX/CYC/43a Housing need update) does not to discuss the latest trends, or the severity of the problem. Previous evidence did however recognise the scale of the challenge, and the current council<sup>9</sup> plan states:

“Currently, York’s housing market is characterised by high demand and low supply, which pushes up house prices and rents above the regional average, creating a challenging environment for York residents.”

30. The latest data and a summing up of the state of play of the wider housing market is appropriate context for two issues. These are:

- Understanding the demographic changes highlighted in Part 1; and
- Setting the scene for the review of the two evidence reports in Parts 4 and 5 of this report.

31. Looking first at house prices it is useful to sum up York’s relative ranking and position, against the 72 Local Authority areas (LAs) which are part of the wider north of England, this includes all LAs in the North East, the North West and Yorkshire and Humber regions. **York<sup>10</sup> has the:**

### **For all properties**

3<sup>rd</sup> highest median price at £253,000, and the 3<sup>rd</sup> highest increase in values since 1995. It also had the 3<sup>rd</sup> Highest Lower Quartile<sup>11</sup> (LQ) price at £201,000.

### **Semi Detached**

2<sup>nd</sup> highest LQ price in 2020 at £219,750

### **Terraced Houses**

2<sup>nd</sup> highest median price £222,000 and 2<sup>nd</sup> highest LQ at £193,000

### **Flats**

4<sup>th</sup> highest median price £170,000 and the 2<sup>nd</sup> highest LQ price £149,500. Manchester has the highest LQ value at £150,000)

32. There has been a clear shift in house prices by price banding even within the period since Local Plan preparations began in 2103<sup>12</sup>. The table below shows these shifts.

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<sup>9</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>10</sup> Latest available data to year ending December 2020 from ONS Small Area House Prices Administrative areas

<sup>11</sup> Lower Quartile is a measure of the middle number between the smallest number in a data set and the value of the median is the middle number in a set of data.

<sup>12</sup> Local Plan Preferred Options and supporting documents were consulted on in summer 2013.

Figure 6 House price banding changes

	2013	2019	2020	2013-19 Change
£100,000 and under	3.4	0.5	0.7	-2.8
£100,001 to 150,000	24.8	6.0	4.3	-18.7
£150,001 to 200,000	31.9	22.8	19.8	-9.1
£200,001 to 300,000	26.7	40.4	40.9	13.8
£300,001 to 400,000	7.7	17.8	18.9	10.1
£400,001 to 500,000	3.7	6.4	7.8	2.7
£500,001 to 800,000	1.6	5.0	5.9	3.4
£800,001 - 1,000,000	0.2	0.6	0.7	0.4
£1,000,000 and over	0.1	0.3	0.9	0.2
Total Sales	3422	3149	2340	

33. In the six years between 2013 and 2019 the percentage of sales under £150,000 fell by 21.5%. This amounted to 756 less sales at this level. Sales between £150,000 and £200,000 fell by a further 9.1% (375 sales).

34. Sales of properties priced between £200,000 and £400,000 increased between 2013 and 2019 by 23.9%. This amounted to an extra 659 sales. These shifts reinforce starkly the reality of rising prices in for a six year period.

35. For 2020 and up to the 9<sup>th</sup> of April 2021, the Land Registry recorded 3,022 house sales within York. An analysis of these across 2020 and 2021 show a total cumulative sales value of £893,173,442.

36. There were 23 sales of over £1m, and the overall average was £295,000 across 2020 and 2021

### Affordability ratio<sup>13</sup>

37. Part of the current assessment of Local Housing Need<sup>14</sup> uses a workplace affordability ratio. This is the relationship between the median earnings and median house prices of those that live and work in a Local Authority (LA) (or live elsewhere and work in that LA). Workplace earnings are slightly higher in York than resident based earnings (which is a measure of those who live in the LA regardless of where they work). This measure is also available at a Lower Quartile level (see footnote 11 on page 9).

38. York has the 3<sup>rd</sup> highest LQ ratio across the 72 northern LAs at 9.09. The England level is 7.15, and the LQ affordability ratio for the Yorkshire and Humber region is only 5.65.

39. Turning to the median measure, York has the 7<sup>th</sup> highest ratio for the 72 northern LAs (it was the 13<sup>th</sup> highest in 2013) at 8.09. The England level is 7.84, and for Yorkshire and Humberside region it is 5.84.

### House Price rentals

40. The Valuation Office and latterly ONS, publish private rental price statistics. In addition to the high house prices outline above York has high private rental costs.

<sup>13</sup> Data presented for 2020.

<sup>14</sup> The term applied by Government to the output of the Standard Method.

41. York has the 3<sup>rd</sup> highest private rent prices (for median and LQ) across all 72 northern LAs.

42. The data is broken down by bedroom.

[Figure 7 Private Rental levels](#)

Lower Quartile		Room	Studio	1	2	3	4+	All
	Yorkshire & Humber	325	360	400	475	475	533	475
	York	370	493	600	695	695	800	675
<b>Median</b>								
	Yorkshire & Humber	368	450	495	575	625	975	575
	York	425	548	668	765	895	1,386	775
<b>Upper Quartile</b>								
	Yorkshire & Humber	417	450	600	695	750	1,350	720
	York	499	548	725	825	1,020	1,750	895

43. The average rent paid in York in 2020/21 for each category was (per month and annual):

- Lower Quartile £ 675 / £8,100, from £600 / £7,200 for a 1 bed to £800 / £9,600 for a 4 or more bed property
- Median £775 / £9,300, from £668 / £8,106 for a 1 bed to £1,386 / £16,632 for a 4 or more bed property
- Upper Quartile £895 / £10,740, from £725 / £8,700 for a 1 bed to £1,750/£21,000 for a 4 bed or more property.

44. The York dividend<sup>15</sup> compared to the regional average is £2,076 pa for a 1 bed, rising to £4,932 pa for a 4 or more bed rental. This amounts to rents in York being from 35% (1 bed) to 42% (4 bed or more) higher in York.

### Affordable Housing Completions

45. The delivery of a range of affordable homes, both for rent and shared owners is shown in Figure 8 below.

[Figure 8 Affordable Homes Delivery](#) <sup>16</sup>

Year	Social Rent	Low cost Ownership	Intermediate Rent	Affordable rent	Total Affordable completions
2013/14	23	22	0	5	50
2014/15	63	25	3	48	139
2015/16	77	32	0	0	109
2016/17	53	16	21	0	90
2017/18	61	13	0	0	74

<sup>15</sup> This is the difference in monthly rent between York UA and Yorkshire and Humber region converted to an annual figure.

<sup>16</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply>

<b>2018/19</b>	36	24	0	0	60
<b>2019/20</b>	93	31	0	0	124
<b>2013-20</b>	406	163	24	53	646

46. There have been 646 additions to the wider affordable housing stock since 2013. The affordable rent sector has seen an additional 483 properties. However, across this period there have been 480 Right to Buy Sales in York of social rented properties. Since 2013, the net gain on affordable homes in York has been only 166 units. In terms of rented social/affordable stock (Social rent plus Affordable rent) the difference between sales of existing properties under Right to Buy and new stock has been only 3.

## Conclusion

York has significant housing market pressures, as the Council acknowledges. For house prices, rental values, affordability ratios and affordable housing delivery of homes to rent, the challenges are worsening and the responses from the Plan insufficient. As Section 2 shows, it is reasonable to conclude that the combination of affordability and supply at the right level, is leading to more working age people leaving York. Of these people, some will work in York so these moves would lead to an increase in commuting back into York.

## Part 3 Economic position and prospects

47. There is some clear evidence emerging from the latest Council Plan on the relative buoyancy of the York economy.

“York<sup>17</sup> contributes £5.2bn to the UK’s economy, making the city a key driver in regional growth. There are over 9,000 businesses in York, an increase of 13% since 2012. Our workforce has the highest skill level of any northern city with 47.9% of the population qualified to NVQ L4 or higher. 49% of York’s workforce are classified as working in higher level occupations, compared to 43% in the region and 47% nationally.”

48. The topics with relevant recent data are: employment and earnings. The broad descriptions of the York economy from the City of York Council Plan, (quote above) and the extract below from a Feb 2020 committee report on progress on the York Economic Strategy, are helpful and good summaries.

Continuing York’s successful growth trajectory<sup>18</sup>

“12. The York economy is, in general, doing well. There are more people than ever in work, with higher levels of productivity than the rest of the region. Our knowledge economy is strong and growing, and we have the best qualified workforce of any northern city. A key element of our new Economic Strategy must be to seek to continue this strong performance, working through Make It York to further build sectoral strengths in rail, financial and professional services, creative and digital, and biotech. These sectors are highlighted in proposed changes to the Make It York service level agreement, and also formed the basis of our economic development brief to the York Central Partnership.

13. Further opportunities will also be sought to work with other partners, including our Universities, to promote the growth of these sectors. One such opportunity has recently emerged through a joint initiative between York Science Park, University of York and Whitecap Consulting. These partners are proposing a feasibility study into the establishment of a York-based technology accelerator.”

### Employment

49. Recent employment trends have been strong, although due to the survey nature of some sources there can be annual fluctuations. EX/CYC/29 acknowledge this recent strong performance. Page 19 of this work states:

“According to the BRES data, employment growth over the last few years has been stronger than was anticipated in 2015. Fig 13 shows that in the years where data is now available (2014-2018), the number of additional jobs per year created in York reached 1,110 on average (despite a slight decline in the data in 2018), compared to 810 back in 2015.”

49. This report deals with this issue of high levels of recent employment growth later, save to note at this stage that the average employment growth for recent years is higher than the Economic Outlook Paper (EX/CYC/29) projects forward. There are two ways of showing the extent of recent employment growth. The first is to use Business Register and Employment Survey (BRES) data which runs from 2015 to 2019. The other source is the total jobs measure (from the Jobs Density data set) and is more comprehensive, with all self-employment captured and runs from 2000-19. We note the requirement of PPG Paragraph 018 (Reference ID: 2a-018-20140306) that plan makers should assess the likely change in

<sup>17</sup> <https://www.york.gov.uk/downloads/file/2132/council-plan-2019-to-2023>

<sup>18</sup> [Economic Strategy Update.pdf \(york.gov.uk\)](#)

job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

50. The number of new employees from 2015 to 2019 increased by 5,000, or 1,250 averaged across the period. Employment increased by 4,000 or 1,000 across the period. The Total Jobs measure shows jobs growth of:

- 947 jobs per annum for 2000-19
- 1,100 jobs per annum for 2009-19
- 1,200 jobs per annum for 2014-19.

51. The scale of employment generation achieved by the combination of investments, sectors and natural assets, the universities, tourism demand boosting the retail and leisure catchment role for surrounding rural areas, mean that while York still has challenges to overcome, its employment generating potential is clear.

### **Earnings**

52. Earnings in York (of those who live in York and may work elsewhere, or live and work in York) increased by 2.4% between 2015-20<sup>19</sup> for full time workers. This was the lowest increase across the 21 LAs in the region. Between 2009-20 residence based earnings increased by 17.6%, and York was ranked 16<sup>th</sup> out of 20.

53. Earnings in York on a workplace basis (those living and working in York and those who live outside the area but work in York) increased by 16.2% for full time workers, the 4<sup>th</sup> highest increase. Between 2009-20 the workplace earnings increased by 20.9%, the 7<sup>th</sup> highest increase in York.

### **Current Projects**

54. While overall, the York economy has been relatively buoyant, there remain local challenges and the need to consider the future health and robustness of any local economy within a wider national and international context. The health, social and economic interruptions and consequences of the Covid pandemic, and the ongoing play out of the implications of leaving the EU make those challenges clear. A response from the Council and partners to securing the long term future of the York economy was to develop the York Central concept.

55. The Council saw<sup>20</sup> York Central as fulfilling two main roles, addressing low wages and a key regeneration opportunity.

“York Central is a 72 hectare (ha) area of land adjacent to the railway station and is one of the largest brownfield sites in northern England. It provides a huge opportunity for regeneration and could provide up to 2500 homes and over 100,000 sq. m of Grade A commercial office space, offering the best chance to address the key problem in York’s economy – relatively low wage levels, given the high level of skills in the city.”

56. The Council and partners clearly saw the site as a significant boost to the local economy, quoting (as seen below) the opportunity to grow the economy by 20%.

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<sup>19</sup> 2020 saw a slight fall in earnings likely to be linked to Covid impacts.

<sup>20</sup> <https://democracy.york.gov.uk/documents/s101740/York%20Central%20Exec%20December%2015%20Final.pdf> Para 1

## Welcome to York Central<sup>21</sup>

“A project of huge ambition, transforming underused land into vibrant and distinctive residential neighbourhoods, cultural spaces, and a high-quality commercial quarter at the heart of one of the UK’s most historic and desirable cities. It will power York’s economy into the future, helping to provide the homes the city needs and grow its economy by 20%.”

York Central is the most significant urban expansion in the ancient city of York’s modern history and currently one of the largest development projects in the UK.”

57. The current outputs expected are:

- 112,000 sq. m of commercial space including high class office accommodation.
- 6,500 jobs.
- £1.16bn to the economy.

58. York’s economy is currently worth £6.3 bn (2020 GVA) and has a total of around 124,000 total jobs. It is important to illustrate what does “grow its economy by 20%” mean in this context?

59. A 20% increase (over an unspecified period) would either be an uplift to the size of the economy above existing trends ...or would be a 20% increase to employment, again, and crucially above trends. The figures associated with these uplifts are set out below to illustrate the extent of the impact this level of growth could have, and that should be reflected in any policy on economic forecasts.

60. To calculate these figures the assumptions used are:

York’s economy (as measured by GVA) has grown by 24% since 2015 – 6% a year. However, the average growth from 2009-19 (which incorporates a slow down associated with the financial crisis 2008-11) was 2.8% on average, and this growth is applied to GVA from 2019- 2031 (at 2019 prices, that is with no inflation adjustment), assuming a ten year period (from 2021) to build out and for York Central to reach the expected ripple out benefits.

61. York’s economy at this conservative 2.8% annual growth would increase from £6.3 bn in 2019 to £8.6bn in 2031, an increase of 37%. This illustrates a trend growth. Clearly if growth was maintained at the 6% rate experienced from 2015-19 this would give higher outputs.

62. A 20% increase on this trend growth (of £2.3bn or 37%) would represent additional growth of £1.3bn. This illustration matches broadly the £1.16bn figure quoted in the York Central website.

63. If the 20% was read as an increase to the employment trend, it would be as follows.

64. York has seen employment growth using the Total Jobs measure of 947 per year (2000-19) and 1,100 a year from 2009-19. The average increase since 2014 has been 1200 jobs.

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<sup>21</sup> <http://www.yorkcentral.info/>

[Figure 9. Modelling employment impact of York central at 20%.](#)

Period Average	Average Employment	20% uplift to trend	Implied York Central impact on average employment
<b>2014-19</b>	1200	240	1440
<b>2009-19</b>	1100	220	1320
<b>2000-19</b>	947	189.4	1136.4

65. This suggests that if current trends continued (three different rates are set out) York Central would uplift them the between 189 and 240 jobs a year.

66. Of the two scenarios the likely meaning of the 20% uplift is to the wider economic output. However, both approaches provide useful context for understanding the Dec 2019 Oxford Economic work and the GL Hearn latest Housing need update.

67. The final factor in considering the economic evidence behind the Local Plan is the awaited York Economic Strategy<sup>22</sup> review that is still awaited. The Strategy preparation process however has confirmed that:

The development of the strategy will seek to:

- make future growth more inclusive and give voice to the everyday lived experience of those who may not have seen the benefits of York’s economic growth
- build on the success that York has seen in recent years in growing higher paid jobs, developing our key sites, and working with our Universities
- respond to the low-carbon commitments of the city, along the principles of a just transition, as expressed in the Council Plan
- shape a new skills plan for York, built around the future needs of businesses and residents.

68. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy it is a clearly unhelpful that the new Economic Strategy is not part of the current consultation. This is especially so for two main reasons. The first is that evidence that is used to support the Plan’s housing need assessment and ultimately housing target is still using economic forecasts from the middle of the last decade. It is unclear whether these scenarios are what underpins the thinking behind the York Economic Strategy update. The second factor is set out by the Council themselves<sup>23</sup>,

“We’ve developed a new economic strategy following a year-long consultation with over 100 business groups, voluntary organisations, educational establishments and entrepreneurs because our ambitions for York can only be delivered when everyone works together.

Our strategy sits alongside our local planning policy and Council Plan, as well as supporting work across city boundaries through the Leeds City Region and York, North Yorkshire and East Riding Local Economic Partnerships.”

<sup>22</sup>[Economic Strategy Update.pdf \(york.gov.uk\)](#)

<sup>23</sup><https://www.york.gov.uk/performance-policies/york-economic-strategy/1>

69. Given that the Council saw the 2016-20 Economic Strategy (the reference above is to this document) as sitting alongside the Local Plan, it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process. While delays to Council workstreams due to the pandemic are understandable, it remains a key gap, particularly when the latest Oxford Economic work is considered in more detail, in the following section.

#### Conclusion

York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. The Plan and its supporting evidence however continue to reflect a less ambitious future for York and is reliant on an out of date Economic Strategy.

## Part 4 Review and Critique of EX/CYC/29 Economic Outlook

### Summary

70. Oxford Economics (OE) undertook an update report covering the economic outlook and scenario results for the York economy. This work was published in December 2019. It sets out the York implications of the OE national November 2019 forecast, (the new baseline) and presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%.

71. The rationale for this reprofiling is not set out in detail, and while the professional / financial etc uplift may well be linked to the York Central proposal it is not explicitly stated that this is the case. The reduction on accommodation and food and retail (and the increases to the professional sectors) are referenced once, on page 21.

“as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York”

72. It is not clear if this reference is to the relevant (to York) Local Enterprise Partnership Strategic Economic Plan – The York, North Yorkshire and East Riding Strategic Economic Plan, which is from 2014, and the Leeds City Region Strategic Economic Plan 2016-36 which is from 2016. Strategic Economic Plans from LEPS have largely been replaced by Local Industrial Strategies, which in themselves are likely to be replaced by Covid Recovery / Levelling up responses.

73. The Reference may be to the York Economic Strategy, which as set out in Part 3 above, a new version (presumably for 2021/2 to 2025) is in preparation. The earlier version covers 2016-20. The source of the 20% uplift for some sector employment and 10% reduction is not clear or justified.

74. While this may seem trivial, it fits a pattern of the economic evidence not being fit for purpose. There are no issues with the assumptions and the reporting of the outcomes from OE. There is however a clear lack of clarity about what future for York's economy, the Council are signed up to and support, and how this influences their approach to the right housing target to ensure that the area has the working age population to meet future jobs needs, without an undue reliance on importing commuters to meet increasing employment demand.

75. There also seems to be a disconnect between the economic evidence and the housing needs evidence, and a reluctance to model a York specific growth strategy based on stronger employment growth and the general economy uplift from York Central and other projects.

76. These issues combined mean that the economic evidence is not fulfilling a meaningful role in underpinning consideration of future housing needs.

### Main issues

77. The key issues from EX/CYC/29 are:

- The report is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
- The report does not read across and does not inform the EX/CYC/43a Housing need update GL Hearn in substance.

- The base dates differ to the both the Plan and EX/CYC/43a
- The report takes different views on population and the economy to those in previous and current GL Hearn housing need work. These are not reconciled by either report.
- The report seems to set out results that do not match recent and current actual employment growth in the area.
- The report references York Central – but does not specify the employment (or economic benefits) expected from this key investment. The only reference is to the construction boost.
- The report applies a more pessimistic national view on the York economy, not a policy on bottom up growth scenario.
- The report has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario.
- The reprofiled scenario sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs, it is described as following the UK profile of the main scenario apart from the specific sector changes The reference to explain the reprofiled scenario is on page 21 of Section 6 and reads:

“The scenario assumes that the UK outlook remains unchanged from the baseline, as the assumptions are applied at the local level in order to align future sectoral trends with the Strategic Economic Plans for York. Our detailed assumptions are as follows: ”

- The North Yorkshire LEP (and Leeds City region LEP) produced a Strategic Economic Plan in 2014/2016. It is not clear whether this is what is referenced or whether the City of York Council have a specific York Strategic Economic Plan. This document if it exists does not appear in the examination library as. The reference may be to the expected future review/update of the York Economic Strategy.
- The “local growth with some decline” scenario seems to further bake in an unambitious view of York’s potential, contrary to the Councils own expectations of future employment growth through projects like York central.
- The reprofiled scenario sets out a jobs growth of 510 jobs between 2017-38 and the national UK Nov 19 scenario (baseline) job growth of 450 jobs per annum.

78. If, as seems unlikely, these employment findings from OE are now the City of York Council’s view of the future York economy the following questions are relevant.

- Does this forecast consider the transformational nature of the York Central development?
- Will the Economy Strategy that is in preparation take forward the 510 jobs as its target?
- Why hasn’t the Housing needs work reconciled the different approaches to population, and hence household growth between Ex/CYC/43a and Ex/CYC/29?

- If the jobs target for the plan is now 510 rather than 690 what impacts does that have on York's already low housing need?
- Does the Council agree with EX/CYC/43a that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year? As per Para 3.2 (of EX/CYC/43a) which states:

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]."

### Detailed Issues and Comments

79. Key sections are referenced by page number as there is no paragraph numbering.

80. Pages 2-6 contain commentary on the pre-November 2019 outlook on the UK's economy. There is no discussion on, clearly what were at that time events to come, Covid related economic shocks in 2020 or 2021, or in actual changes following the experienced impacts of the Brexit process. Does EX/CYC/29 remain a robust outlook for York given these changes?

81. Page 6 implies difficulties for York maintaining its working age population, aging and from low migration. One of the factors in this would be ongoing difficulties due to housing affordability and availability. One way to boost the working age population is to encourage a greater quantum of new housing with greater range of mix types and prices.

82. Page 10 rightly highlights the fluctuations in the available employment data. This of course is in part to the survey nature of some of the sources.

"Employment growth in York has been unstable since the 2008 recession, with increases occurring in only four years over the decade to 2018"

83. Employment data at local authority level is typified by these types of fluctuations, but measures of output like Gross Value Added (a measure of the size of the economy) tend to show steadier growth. It may be that it is the sample size of the employment data that varies – not actual employment. The figures on page 10 for employment in York between 2008-18 do not match published sources, either BRES estimates of employment or total jobs from the Jobs Density measure.

- Oxford Economic Model Figures for 2018 119400
- BRES Employment 2018 110,000
- Total Jobs measure 2018 124,000

84. Both BRES and Total jobs suggest employment has increased in the post financial crash period.

85. Part 3 of this report sets out recent employment changes which seem to be increasing. OE acknowledge this in Figure 13 on page 19, but do not explain why this higher "York" growth doesn't continue in either of the scenarios, falling instead broadly from 1000 jobs a year to 500 jobs a year.

86. The Oxford Economics position seems to suggest an annual average job increase of 240 across 2008-18 (page 10 1<sup>st</sup> paragraph).

87. The total jobs measure, a robust source linked to the Inter Departmental Business register shows an increase of 11,000 total jobs across this same period, or 1100 a year, and as shown earlier this rate seems to be increasing in recent years (1666 from 2013-19).

88. These figures are significantly different. The exact sourcing and make up of the derivation of the OE 240 figure should be clarified.

89. The Top of Page 13 states:

“Population growth in York has remained positive in recent years, buoyed by net inward migration. The working-age population in York has grown at a similar pace.”

90. The latest 2018/19 data already presented in Part 1 of this report shows this is not the case, and indeed the last 5 years have seen lower growth than previous periods across the last 20 years.

91. Population change remaining positive is a low bar for a city with the aspirations and potential of York. It is significantly underperforming in terms of robust working age led population growth.

92. Actual population change in York over the last 3 years is 572 lower per year than the average over the 2008-19 period. This is a fundamental component of understanding the dynamics between population and housing provision, and employment prospects.

93. Population growth in York has been “boosted” by significant increases in the 65 plus age group. Working age population growth since 2008 was 8.6% lower than the total population growth of 10.4%. The last 3 years have seen working age population growth on average of 268 less people than the 11 year average from 2008-19.

94. Page 13, 2<sup>nd</sup> paragraph states:

“Recently, growth has been driven by net inward migration, and, to a smaller extent, positive natural change (when the number of births in the area is higher than the number of deaths).”

95. As Part 1 of this report shows the in 2018/19 both internal net migration and natural change were negative compared to previous positive gains:

- Net internal migration averaged at plus 662 for 2011 to 2015. From 2015 to 2019 it has averaged 20.
- Natural change for the same periods fell from 264 per annum to 40 per annum.
- Net international migration has remained broadly constant increasing by 76 people per annum across these two periods.
- Natural change slowed considerably in 2015/16 and net internal migration turned negative in 2014/15. This data will have been available in late 2019.

96. Page 19 notes that stronger employment performance has taken place (for the period 2014-18 at 1100 a year), it is not clear why this data does not provide a greater boost to expected employment in the 2020s at the very least. Why would this growth slow in the modelling other than national assumptions?

97. The interpretation of the demographic trends does not reflect what has been happening.

98. EX/CYC/43a should have explored the consequences of the comments on Page 13 of EX/CYC/29 about the 2016 and 2018 projections. The discussion about differing approaches should be addressed by the Council to explain how these different approaches can be reconciled between the two pieces of their evidence.



105. The annual figures quoted in the OE document are rounded and appear as 450 and 510 jobs per annum.

106. As annual increases this means the baseline sets out a view that employment growth is considerably lower than current recent trends. This work does not provide a policy on or positive view of the future performance of the York economy in line with Council's correct reading of the strength of the local economy or to test out the major impacts expected from York Central.

107. More importantly it does not provide an alternative consistent view to enable the assessment of the extent to which the Plan's housing target needs to change to accommodate future economic growth.

108. The work models the impact of national trends. It doesn't however ask or answer the question about whether local projects (York Central) and trends provide a "growth plus" scenario which should inform discussions about future housing need, and the need to provide affordable and available dwellings to maintain or grow the local working age population. It does not provide, and presumably wasn't asked to provide a positive "growth" scenario, or a specific York Central scenario with its 20% growth central benefit.

## Part 5 Review and Critique of EX/CYC/43a Housing need update

### Summary

109. The latest Housing Needs update which is already somewhat dated considers the impact of the 2018 projections. It does not comment or provide an update on the worsening affordability issues in York. .

110. However, while it tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly, only offering the conclusion that 650 jobs is corroborated by an employment forecast of 450 to 510 jobs per year.

111. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1,000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

### Main messages

112. GL HEARN state at:

“3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29].”

113. The OE work EX/CYC/29 dated Dec 2019 considers a baseline output of 450 jobs per year (2017-38) and a refined scenario of 510 jobs for the same period. This does not seem to be corroboration of 650 but a significant reduction.

114. The OE work EX/CYC/29 also highlights that job creation in the 2014-18 was over 1000 a year. This broadly matches available published data and given the economic potential of York and the impacts of the transformational York Central development, and the Governments Levelling Up agenda, means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not backed up by either the OE work or York's recent employment performance. It, in effect represents, planning for less growth than York is capable of.

115. The trends and factors behind the slow down in York's population growth are not addressed – other than an acknowledgement that estimates exist that run to 2019. This should have been a material check on the sense of the housing need conclusions in EX/CYC/43a.

116. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse. This is especially so given the drop in employment forecast in EX/CYC/29. EX/CYC/43a states on page 17:

“5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited.”

117. Given the material evidence that since the City of York Local plan process began in 2013 the affordability metrics for York have severely worsened it is highly unusual in

Understanding Data's experience to not assess the extent of this. The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.

118. On page 18, EX/CYC/43a continues:

"5.8 To conclude, the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data."

119. The housing need is materially worse. Population has slowed considerably. Affordability has worsened. The political agenda has shifted even more fully to a standard method (York housing need would be 1013 dpa). Covid and Brexit have exacerbated an agenda around levelling up and growth. The latest OE report undermines the GL Hearn reports reliance on 690 jobs, by setting out a range of employment provision of between 450 and 510 jobs. It is argued that the circumstances that influence, and the likely direct assessments of housing need have changed significantly, and all coalesce to suggest that the need should be higher than 870 dpa.

### Detailed Issues and Comments

#### Section 1 INTRODUCTION

"1.1 The latest set of (2018-based) Sub-National Population Projections (SNPP) were published by the Office for National Statistics (ONS) in March 2020. Drawing from these, in June 2020, ONS published the 2018-based Sub-National Household Projections (SNHP). This report seeks to assess the impact on housing need in the City of York as a result of the latest Household Projections".

120. EX/CYC/43a does not seek to critically assess the housing need implications or balance between the latest Economic forecasts results and the future working age population of the area, instead noting,

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]".

121. It is noted that the report does not set out to address the worsening affordability problems in York:

"5.7 We have not updated market signals for the City however given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa."

#### Section 2 DEMOGRAPHICS

"2.1 According to the Office for National Statistics (ONS), the latest Mid-Year Population Estimate for the City of York was 210,618 in 2019"

122. The report notes the 2019 population but does not discuss or explore that the 2018/19 increase has been the lowest annual population change since 1996. There have been clear downward trends in demographic change since 2011, while the New Local Plan for York has been under preparation.

123. The sections on the 2018 projections are largely factual. What is lacking is discussion that would reasonably draw conclusions that the affordability and supply issues in York are linked to the falling population growth, and that, by choosing to use household projections that increasingly pick up this slow down of growth as the basis for predicting future housing need York is not planning for the level of growth that is required to tackle the very issues that causing that slowdown in both population and household formation. While the older 2014 projections provide the more aspirational match to increasing housing supply (compared to generally lower outcomes from the 2016 and 2018 projections) from the Government's perspective, the CYC Local Plan, and its evidence continue to avoid the demographic and affordability challenge that recent data provides.

124. The assessment of the shorter term migration (2 years) data behind the 2018 projections is fair and is clearly a change from earlier projections which used 5 or 6 years of data to provide the input to reflect the key role that migration plays in influencing the nature and total population change in areas. What ONS are very clear about is they view the methodological changes 2017-19 mid year population estimates as clear improvements over the way internal migration was calculated for the 2012-16 period. Therefore the 2018 projections use the, at that point "improved" 2 years of available data as the reference period for internal migration. It is also why ONS are committed to revising historic population estimates for 2012-16 with the new migration estimation methodology as part of the expected 2012-2020 revisions to population following the availability of 2021 Census results.

"2.21 In examining the demographic trends nationally there are clear issues with focussing on the principal variant which draws on just two years' worth of data to project trends. This is acknowledged by ONS themselves and there is, therefore, some merit in looking at longer-term trends.

2.22 We would, therefore, see the variant migration scenarios as being the more suitable to use for York. However, this is all largely academic as demographic housing need as the following chapter sets out is lower than the economic led housing need."

### Section 3 ECONOMIC LED HOUSING NEED

"3.2 The scale of economic growth of 650 jobs was in the submitted local plan and was further corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that this needed 790 homes per annum to support it. This note has not sought to update the economic growth assessment but this chapter examines the impact of newer data on the economic-led housing need."

The 650 jobs figure.

125. The scale of economic growth that sits behind the submitted local plan and the recent housing need papers, EX/CYC/9 2019 and by default EX/CYC/43a rely on a job forecast that was contained in the Employment Land Review (SD063) in 2017. The Oxford Economics forecast (OE2) that set out future employment growth levels of 650 per annum was itself produced in 2016.

126. The ELR update (SD063) states: "5.1...As set out in this ELR Update, the Experian (REM) model broadly supports the original growth projections included in the OE 2015 model."

127. The REM forecast that ELR SD063 references was for 806 j.p.a between 2015-31 – OE scenario 2 was for 650 j.p.a between 2014-31. The difference is 156 jobs annually. This difference does not qualifies as broadly supporting.

128. In a similar fashion the further corroboration mentioned in EX/CYC/43a (para 3.2) between the earlier OE2 650 jobs and the 2019 (EX/CYC/9) results are as follows.

- OE2 – SD063 and EX/CYC/9 - 650 jobs per annum
- EX/CYC/29 sets out two different jobs totals and doesn't recommend one over the other. The annual totals for 2017-2038 are for 454 and 513 jobs (baseline and reprofiled scenario). That is 30.2% and 21% lower respectively than the 650 jobs that EX/CYC/43a says is still a relevant total. Unless there is some missing documentation/evidence from the Council I think it is reasonable that most people would not see 454 and 513 jobs per years as corroborating 650 jobs.

“3.5 We have not examined the economic need associated with historic employment growth as the accommodation has already been provided to support that growth. We have therefore focussed on the economic-led need required to support 650 jobs per annum for the period 2019-33 and 2019-37 with the interim period to 2019 taken from published in MYE.”

129. The very historic employment growth that EX/CYC 43a references in paragraph 3.5 is set out previously and shows employment growth of up to and over 1000 a year. The fact that population growth has slowed during this period would suggest that the (housing) accommodation has not been provided to match this growth and that it is likely that there are increases of in commuting from outside the area to jobs within York.

130. The 2019 employment forecasts (EX/CYC/29):

- Do not reflect Covid pandemic economic shocks, or the actual Brexit challenges since the withdrawal agreement came into place.
- They do not model the impact of York Central – a 20% boost to York's economy.
- They reflect national (November 2019) OE forecasts applied to a mix of Yorkshire and Humber regional and York UA specific data.
- They apply a 20% uplift to sectors which could be considered and a 10% decline to retail, and food and accommodation that are key York sectors.

131. They do not provide an up to date trend based view of the York economy, and more importantly do not provide a growth / aspirational scenario which reflects York's economic strength, and the weight that the Council and LEP place York Central.

132. As a result of this the exploration within EX/CYC/43a does not take into account the relevant understanding of economic potential, does not consider a likely jobs forecast that reflects employment creation that has been around 1,000 a year recently, and does not consider the population or household and housing implications of developments such as York Central.

133. In the absence of these factors, the York housing need figure remains unduly influenced by a 2016 employment forecast. In conjunction with the ongoing choice to base the starting point on projections that are based on reducing and lower population growth, rather than the Government mandated 2014 set of projections, the economic material behind the Plan's assessment of housing need and its subsequent housing target is flawed, out of date and not credible against recent trends or known future investments.

#### Section 4 STANDARD METHOD FOR ASSESSING HOUSING NEED

134. This section sets out the 2017 Standard method workings (with a local housing need of 1026), the proposed method which incorporated a housing stock element and was somewhat erroneously referred to as the mutant algorithm, (with a LHN of 763), and has been overtaken by further changes in the Standard Method (2020) which with 2019

affordability ratio and household growth for 2020-30 gives a York LHN of 1022 and for 2021-31 household growth and 2020 affordability ratio gives a LHN of 1013.

135. The current Standard Method set out a Local Housing Need for York of 1013. This does not, at 28% higher does not broadly corroborate the Plan target, in the way EX/CYC/43a found with the previous LHN of 763.

## Section 5 CONCLUSIONS

136. In the conclusions of EX/CYC/43a the report states when referring to the 2018 set of projections that:

“5.4 The highest of these is the 10-year migration variant which results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.”

137. While 670 dwellings from the 10-year migration variant is indeed lower than the 790 dwelling (economic 650 jobs) figure, the adjustments to the 670 are from a partial return to trend on HRR rates and a 3% vacancy rate. (Seen by comparing Table 4 and Table 5 in EX/CYC/43a). There has been no economic or market signals adjustment to the 2018 SNHP 10-year migration variant.

138. Applying a 20% market signals, wholly justified from the worsening evidence across the last decade, would see this figure rise to 804 dwellings per annum. Given that EX/CYC/29 and EX/CYC/43a do not assess any higher employment trend or York Central 20% whole economy uplift, it is likely that there would need to be a further uplift to reflect this economic potential.

## Part 6 Final thoughts and implications for the Local housing Need

139. There are several concerning issues found in the latest evidence that reinforce the wider concerns raised previously, that the evidence is being used to fit a lower growth narrative and which does not align with the current housing need in York, the worsening of affordability issues, and does not reflect the strong employment performance of the local labour market, or key economic investments planned.

140. with the Council outside of the Plan's evidence acknowledges the scale of housing crisis and severe unaffordability. The Plan's latest housing need update, EX/CYC/43a chooses not to update on these issues, and that the evidence and the Plan choose not to make any adjustment to the housing need figure to address these challenges.

141. This is somewhat hidden behind an either/ or argument that because there is an economic uplift the affordability uplift is not necessary.

142. Guidance does not specify that only one adjustment needs to be made.

143. On the jobs front (EX/CYC.9) the report is out of date, being produced pre Covid and pre Brexit implementation. It finds that job growth over the period is lower than the 650 jobs that EX/CYC/43a remains based on. EX/CYC/43a finds that a jobs range of 450 to 510 corroborates the 650 figure. These findings though are flawed in two main respects. They do not:

- explain why York's employment performance would shift from the recent strong growth to a much lower level.
- Factor in the scale of the positive or policy on investments and projects that York has which would lead to growth above recent employment trends

144. The implication of this following the Council's logic model is that housing need would be lower, and that this would then merit an affordability uplift.

145. Whether under the previous regime of guidance or the current, what is clear is that the Government's overriding priority is to boost, not restrain housing growth. The City of York Local Plan actively chooses to restrain.

146. There is a circularity at play. It is the contention of this evidence and previous submissions that the affordability issues and lack of supply have led to a slow down in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels. The Council and its evidence do not set out there latest economic view of the York economy future, and the economic evidence that is used remains out of date and fails to reflect the employment growth that York has experienced. The major impacts of York Central I do not appear to influence the calculations of housing need.

### Implications for Housing Need

147. It seems unlikely that the Government could have expected a scenario where in 2021/22 a Local Plan examination would still be examined under the 2012 NPPF via the transitional arrangements that were clearly intended to be for a short period of time.

148. While it would be possible to continue to argue that under the 2012 NPPF the 2014 sub national household projections provide the right and aspirational projections to use as a starting point, and that a set of adjustments for housing need would remain warranted, a vacancy rate, an household formation rate uplift targeted at those aged 25-44, there remains a key missing element of the Plan's evidence around a clear economic strategy and linked

employment forecasts that reflect the growth that has not only happened but is expected to happen locally.

148. While Covid and other economic shocks play out, there are increasingly national and regional policy levers being put in place that mean York would be able to plan for future ongoing investments and demand for economic growth.

149. Given the delays in the Plan process, ongoing issues with the evidence and lack of progress on a new York Economic Strategy, and the underlying demographic, housing affordability and economic evidence it would be a pragmatic to apply standard method figure of 1013 d.p.a. which would ensure consistency with much of the rest of the country to avoid further delay.

150. Any alternative to this would require jobs led forecasts based on a jobs growth figure that was consistent with the Council's yet to be seen Economic Strategy and includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. Any outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.

151. The plan's evidence and ultimately housing need assessment and housing target do not reflect:

- The need to reverse the trend of slowing demographic growth.
- Increasing unaffordability, rents and house prices.
- An increasingly ageing population.
- No significant additions to the local affordable stock (once RTB considered)
- A strong growing economy with major investment plans with seemingly transformational impacts Out of date economic assumptions that don't reflect recent trends or future potential.
- The clear intention of the Government approach to housing provision – which is to boost supply.

152. The evidence that sits behind the Plan is out of date (EX/CYC/29), partial (Ex/CYC/43a) and does not fully and transparently reflect current economic growth plans. The Council's current Economic Strategy is out of date and does not provide the steer to address future employment prospects.

153. The housing evidence consistently considers partial new evidence and concludes no changes are need to the assessed need and the Plans dwelling target. This isn't credible in the light of the demographic changes York is experiencing, the housing market pressures and the decisions to actively downplay the economic potential of the area.



## Appendix 2

**LDP Housing Delivery Trajectory for ST15 and Langwith (submitted in July 2019)**

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## Appendix 3

**LDP Housing Delivery Trajectory for ST15 and Langwith (updated July 2021)**

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Housing Delivery Trajectories

Total Housing

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)												Beyond Plan Period											
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46												
	Total																																				
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	35	70	105	105	105	140	210	210	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280											
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																																				
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	103		103	154	154	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206	206												
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223	223												
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			25	100	100	200	200	200	250	300	300	300	300	300	300	2875	300	300	300	237																

Affordable Housing Only

Site	Scenario	CYC Plan Period												Quoted Plan Period (Extension)												Beyond Plan Period											
		2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	Revised Plan Period Delivery	2038/39	2039/40	2040/41	2041/42	2042/43	2043/44	2044/45	2045/46												
	Total																																				
5715	CVC Housing Supply Trajectory Update, May 2021 (EX/CVC/591)	9	18	26	26	26	35	53	53	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70												
5715	CVC Housing Supply Trajectory Update, May 2021, Adjusted by Quoted																																				
Length	Quoted, Regulation 19 Representations (adjusted start date due to Local Plan delay)	26		26	39	39	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52													
Length	Updated Delivery Rate Scenario 1 (Bidwells: 223dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56													
Length	Updated Delivery Rate Scenario 2 (Bidwells: 300dpa peak) (adjusted start date due to Local Plan delay)			6	25	25	50	50	50	63	75	75	75	75	75	719	75	75	75	59																	

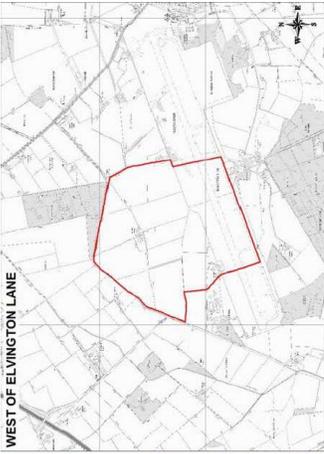
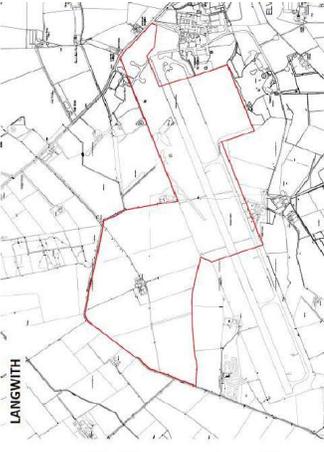
See Appendix 5 LDP's Representations to the York Local Plan PMS (June 2019) for background to above assumptions.



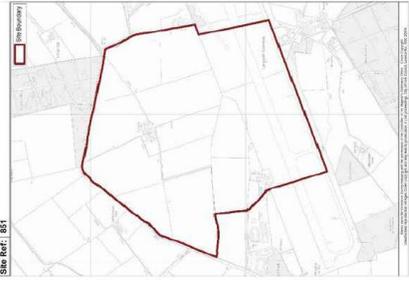
## Appendix 4

### LDP's Green Belt Assessment (update) for Langwith

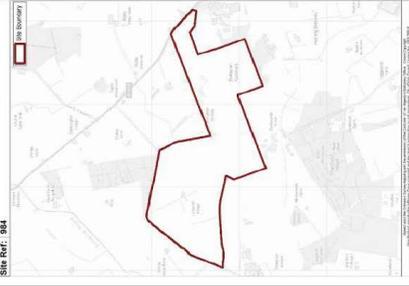
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<p><b>ST15</b></p>	 <p>WEST OF ELVINGTON LANE</p>  <p>WEST OF ELVINGTON LANE</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The boundary in the Submitted Local Plan shows a 159ha Garden Village, yielding 3,339 dwellings. Work to date indicates that the land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery.</p>	<p><b>Langwith</b></p>  <p>LANGWITH</p>  <p>LANGWITH</p>	<p><b>Scoping Strategic Principles: SP1, SP6, SP7, SP10, SP11</b></p> <p><b>Site Overview:</b> The proposed boundary shows a Garden Village of c. 204ha, yielding approximately 4,000 dwellings. The land is controlled by willing landowners, meets the Council's site selection criteria relating to land constraints and accessibility of services and transport, and is free of fundamental constraints to delivery. Langwith Development Partnership (LDP) have prepared (and submitted to CYC as part of the Local Plan process), technical evidence to demonstrate its appropriateness for development. It is therefore viable and deliverable.</p>
<p><b>1. Appraising the impact of potential sites against the spatial strategy (through the site selection process)</b></p>				
<p><b>Spatial Strategy</b></p>				
<p><b>Land Submitted for Consideration</b></p> <p>Different iterations of the land West of Elvington Lane have been submitted for consideration since submission in 2012. The site allocation and reasonable alternatives identified in the submitted Sustainability Appraisal (2018) are as follows:</p>		<p>Langwith broadly aligns with "Alternative 1 site 984 (Post PPC)", with the sole exception being a very modest difference to the south-east corner adjacent to the Yorkshire Air Museum (see below). The boundary shown below was twice recommended by Officers to the Council's Local Plan Working Group (LPWG) (in July 2017 and January 2018) as a more appropriate and suitable alternative to ST15.</p>		

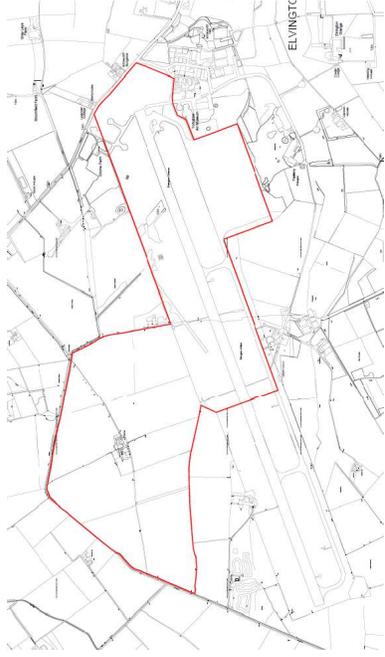
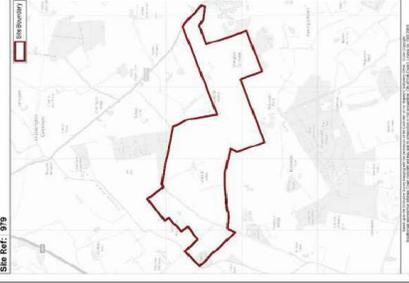
• Allocation – Site 851  
Site Ref: 851



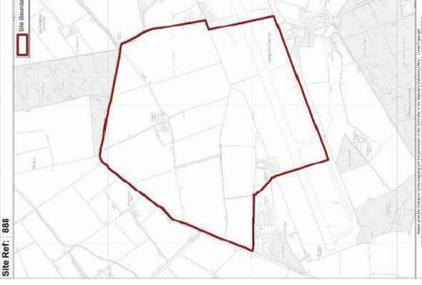
• Alternative 1 site 984 (Post PPC)  
Site Ref: 884



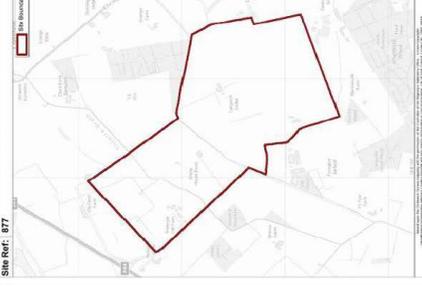
• Alternative 2 Site 975 (Developer PPC)  
Site Ref: 879



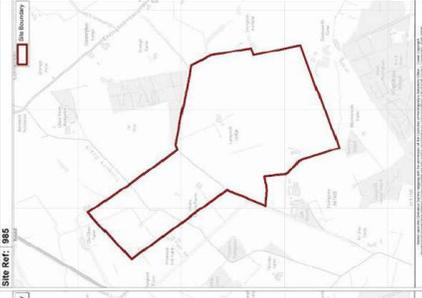
• Ait 3 Site 888 (Developer)  
Site Ref: 888



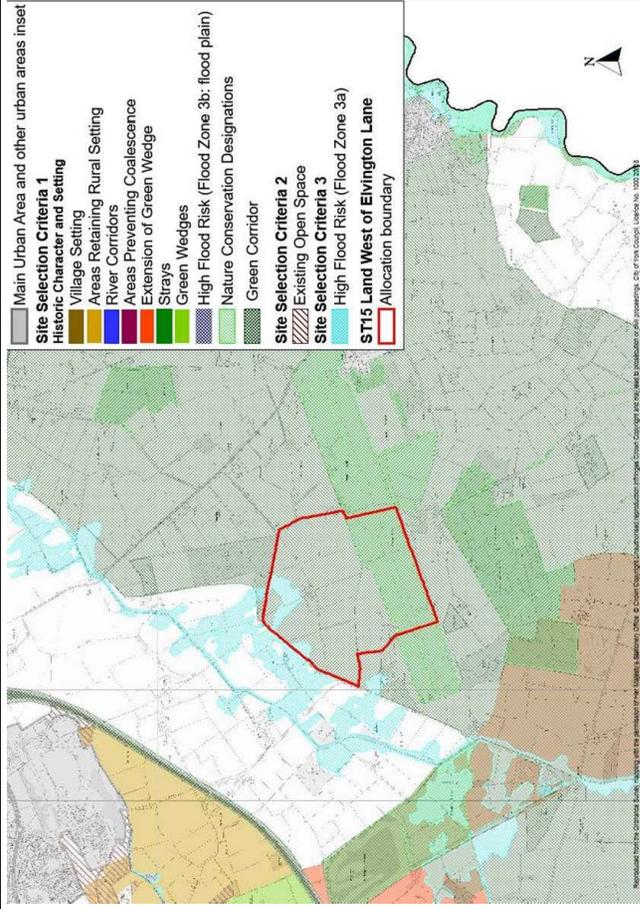
• Ait 4 site 877 / 985  
Site Ref: 877



Site Ref: 985



**NPPF Para 85**



n/a – same plan applies

**Sustainable patterns of Development:**

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand should also be provided.

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are

This location forms a sustainable option when judged against the spatial strategy site selection criteria (see Introduction step (5) and para 85 map above):

- It is not located within areas of historic character and setting;
- It contains limited areas of high flood risk; high flood risk areas can be excluded from development leaving sufficient land for a self-sustaining settlement;
- It does not contain existing areas of open space.

The site boundary does incorporate the former Elvington Airfield, which is designated as a site of importance for nature conservation (SINC) for both birds and grasslands. The location is in proximity of Heslington Tillmire SSSI (within 500m) and the River Derwent (SAC)/Lower Derwent Valley SPA (5km). Mitigation for biodiversity will be required. Whilst the site location is also within a local green infrastructure corridor, this is not an absolute constraint and can be used as an opportunity to provide biodiversity net gain and link to existing networks.

Langwith can deliver a significant net gain in biodiversity through the following ecological measures: (i) the creation of a dedicated Habitat Enhancement Area (HEA) of 46.43ha; (ii) the creation of an ecological off-setting area of 90.86ha; and (iii) the managed return to greenfield land on the western part of the airfield, creating a further ecological off-setting area of 54.96ha.

The site does not have access to existing services or facilities but, given the scale of development proposed, it is expected that this would be a self-sustaining, freestanding new village. Consequently, it would deliver a minimum of one local centre incorporating appropriate shops, services and community facilities to meet the needs of future residents. On-site provision to meet nursery, primary and potentially secondary demand

very lightly trafficked roads, and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long term permanence. The land **has potential for development in line with the Local Plan strategy**.

should also be provided.

The scale of settlement proposed achieves a critical mass to support high quality, frequent and accessible public transport services. All parts of Langwith would be within 400m of a public transport route. It is estimated that 4,000 new homes would provide for a bus service every 20 minutes, which would equate to an increase in public transport patronage of c. 15%. Langwith also has the potential for automated electric shuttle services with the University of York and would connect with the existing park and ride facility adjacent to the University, as well as providing public transport to York City Centre (including the railway station).

Access to the site is currently limited but will be improved with a new primary route via a new junction on the A64 leading to a network of new streets enabling new sustainable transport access across the new settlement. The site offers potential for proposed strategic green space to maximise pedestrian/cycle linkages in and out of the site offering connectivity to the wider City via existing connections. Langwith Stray/Long Lane/Common Lane are very lightly trafficked roads and could provide a pleasant cycle route from the site to Heslington. There are also severallbridleways / pedestrian rights of way running through or near to the site that may be suitable for use as cycle/pedestrian routes.

Langwith would also deliver a secondary access via Elvington Lane to the east from the outset of the construction process, allowing the early delivery of c. 1,000 homes in advance of the new A64 junction being constructed. Highways alterations are also proposed to create a new link road between Elvington Lane and Hull Road (see LDP's representations to the Regulation 19 Plan) which will provide highway benefits to the operation of Grimston Bar Junction.

The settlement uses existing physical features to define boundaries and can reinforce these boundaries through masterplanning and the appropriate use of landscaping. It also utilises a considerable amount of brownfield land (c. 103ha) within the former Airfield and will return the western part of the Airfield (beyond the settlement) back to greenfield land.

There is potential to provide a sustainable location for growth (in line with NPPF para 85) to be able to contribute to the long-term permanence. The land **has potential for development in line with the Local Plan strategy**.

## 2. Green Belt Purposes and Boundary Identification

This section assesses land proposed to be allocated against Green Belt purposes as applied through the boundary setting criteria (Section 8), taking into account the principals of the Heritage Topic Paper and Heritage Impact Appraisals (SP6 and SP7), and the sustainability appraisal. It applies the boundary setting methodology to determine a clear defensible boundary.

### Summary Outcomes:

Criterion 1: Compactness	1.1	Yes	Purpose 4 – Spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes	The HIA has potential to result in minor to significant harm as a result of development in this location. Significant harm can be mitigated to minor through masterplanning.	Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes			3.1	Yes	
	3.2	No			3.2	No	

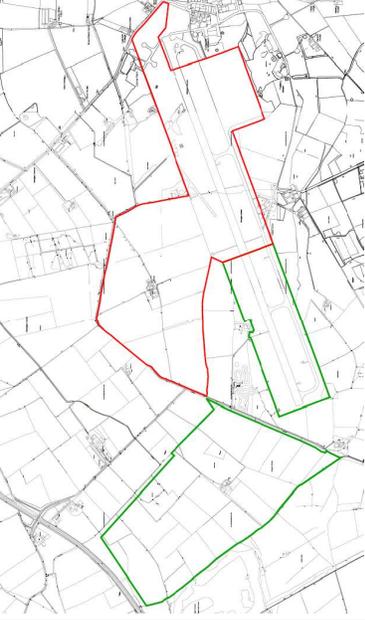
Criterion 1: Compactness	1.1	Yes	Purpose 4 – spatial distribution to include standalone settlements is less harmful in comparison to additional development on the urban edge of York. Through masterplanning and landscaping, it is considered that minor harm would arise.	Criterion 4: Sprawl	4.1	Yes	Purpose 3 – Spatial distribution to include standalone settlements helps to avoid harm by reason of urban sprawl.
	1.2	Yes			4.2	No	
	1.3	No			4.3	No	
Criterion 2: Landmark Monuments	2.1	Yes		Criterion 5: Encroachment	5.1	Yes	Purpose 3 – Encroachment into the countryside as a result of standalone settlements in York is accepted. Spatial distribution to include standalone settlements helps to avoid any significant harm by reason of encroachment overall.
	2.2	Yes			5.2	Yes	
	2.3	No			5.3	Yes	
Criterion 3: Landscape & Setting	3.1	Yes			3.1	Yes	
	3.2	No			3.2	No	

n/a

GB Purpose	Discussion	Outcome	Discussion	Outcome
<p><b>Purpose 4:</b> Preserving the special character of historic towns</p>	<p><b>ST15</b></p> <p>The process of identifying suitable site allocations has followed an interactive process considering the principle set out in the Heritage Topic Paper and Heritage Impact Appraisal to inform purpose 4 objectives.</p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Whilst a freestanding village in this location affects the openness of the Green Belt, the degree of harm has been judged to compactness of the main urban area 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 endorsed by Historic England, a strategy in which part of York's development needs are met in new freestanding settlements helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of this land will result in the creation of a new, free-standing settlement beyond the ring road to the southwest of the city (A64). ST15 as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The allocation boundary is set back from the A64 to create a new green wedge to reduce the impact of development eroding compactness of the main urban area and keys views towards the Wolds. This separation is important to retain the perception of the historic city set in a rural hinterland as well as preventing perception of sprawl or future coalescence with the existing urban edge.</p> <p>The HIA identifies that the introduction of a new settlement within the rural hinterlands of York reduces the generous separation between Elvington/Wheldrake/Heslington and the three become more closely associated and less remote as rural villages. However, there is an opportunity to create settlement with new strong identity. Any impacts are likely to be reduced subject to the implementation of mitigation and treatment of the landscape on all boundary edges in line with offsetting through compensatory improvements to ensure high environmental quality and support for the character and setting of the city. The HIA identifies that this will therefore cause minor harm to compactness.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>	<p><b>Langwith</b></p> <p><b>Compactness</b></p> <p><b>Criterion 1 - 1.1/1.2/1.3</b></p> <p>Delivery of freestanding settlements limits further harm in relation to compactness in comparison to additional development on the urban edge of York.</p> <p>The identity of a compact village as identified by the allocation, in an open or rural landscape is required to maintain the settlement pattern of villages in an open and historic setting.</p> <p>Delivery of Langwith has potential to result in minor harm in relation to compactness of the main urban area through masterplanning and the landscaping of the settlement boundaries.</p> <p>Whilst a freestanding settlement in this location will affect the openness of the Green Belt, the degree of harm is far less than would arise should the required scale of new housing be instead located on the edge of the existing built up area of the City, or in its surrounding settlements. As endorsed by Historic England, a strategy which meets part of York's housing needs through a new, freestanding settlement helps to safeguard the size and compact nature of the historic city, the perception of York being a freestanding 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.</p> <p>Development of Langwith with result in a new, freestanding settlement beyond the ring road (A64) to the south-west of the City. Langwith as a freestanding settlement in this location aligns with the settlement pattern of other freestanding villages set within their own landscape context. The settlement is set back considerably from the A64 to its north, creating a new green wedge between the compact urban area and the closest (north) settlement boundary.</p> <p>This separation maintains the perception of a historic city set in a rural hinterland, as well as preventing the perception of urban sprawl or future coalescence with the existing urban edge. It prevents any impact on the compactness characteristic, therefore.</p> <p>Whilst a new settlement will reduce the generous separation between Elvington, Wheldrake and Heslington, the perception of each as standalone rural villages will be maintained. Langwith also provides an opportunity to create a sustainable settlement with a new, strong identity. Through masterplanning and the treatment of landscaping on all boundary edges, a high quality environment will be achieved.</p> <p>It is therefore considered that minor harm to compactness would arise from Langwith.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS IS LESS HARMFUL IN ADDITIONAL DEVELOPMENT ON THE URBAN EDGE OF YORK.</b></p> <p><b>THE HIA FOR ST15 HAS POTENTIAL TO RESULT IN MINOR HARM AS A RESULT OF DEVELOPMENT IN THIS LOCATION. MITIGATED THROUGH FURTHER MASTERPLANNING</b></p>
	<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of ST15 has a potential to result in minor to significant harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. However, effects are able to be mitigated to be minor harm.</p> <p>ST15 site does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified. There is a</p>		<p><b>Landmark Monuments</b></p> <p><b>Criterion 2 – 2.2/2.3</b></p> <p>Delivery of Langwith has a potential to result in minor harm in relation to landmark monuments relating to views out to the rural hinterland and non-designated heritage assets. This can be appropriately mitigated through landscaping and masterplanning. Langwith does not contain any designated heritage assets or listed buildings. There are several non-designated heritage assets identified.</p>	



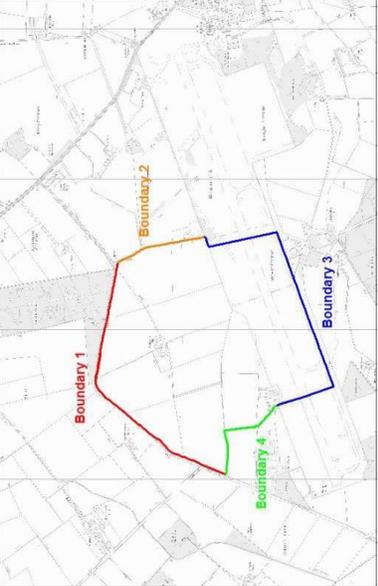
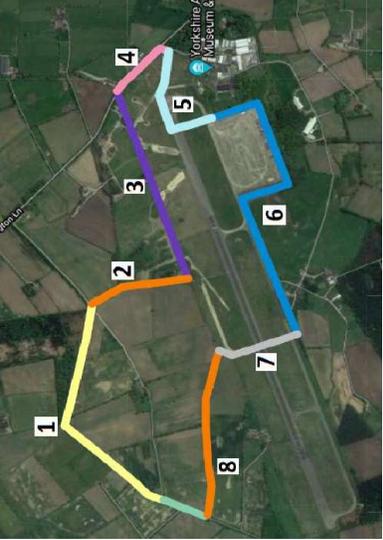
<p><b>Purpose 1:</b> Checking unrestricted sprawl</p>	<p>Historic England acknowledge that the allocation boundary for ST15 has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south- westwards (Regulation 19 consultation, 2018).</p> <p>A local long view over Elvington airfield from Tilmire Farm will be obscured by development. Elvington Airfield is a former WWII airfield; prior to this the land was agricultural fields. The development would reduce the integrity and legibility of the airfield as an open landscape.</p> <p>Several legible non-designated landscape features exist across the site including medieval and post-medieval field boundaries, including ridge and furrow. Development which removed the visible inherited historic grain would be detrimental to the area.</p>	<p>freestanding settlements. It also adopts an identical northern boundary to that of ST15. Historic England acknowledge that ST15 (and therefore by implication Langwith) has been designed to reflect the relationship which York has with its surrounding villages – an element which has been identified as being part of the character of the City. It is also clear that consideration has also been had to the need to increase in the separation of the settlement from the ring road and to produce a form of development which sits more comfortably into the rural landscape, maintain the impression of York being a settlement sitting within an extensive rural hinterland, and maintained the important views of the open countryside from the A64 travelling south-westwards (Regulation 19 consultation, 2018).</p> <p>Internally, Langwith can preserve long views down the former runway through the creation of a new public open landscaped area, retaining the legibility of the former airfield use.</p> <p>Whilst there will inevitably be a loss of open landscaping through the delivery of a new settlement in this part of York, Langwith can mitigate any effects by establishing clearly defined boundaries and maintaining the perception of York as a compact city surrounded by freestanding settlements, set within a rural hinterland. Accordingly, Langwith is considered to result in minor harm in relation to landscape and setting.</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of main urban areas, freestanding settlements help to restrict urban sprawl.</p> <p>The boundary definition of a compact new settlement will help to ensure that potential future sprawl will be avoided in this new urban location.</p> <p>Some important principles were addressed through the ongoing site selection process 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. The site's northern boundary has been significantly set back from the A64 (1.5km) to address the potential significantly negative impact on the setting of the City by development encroaching up to the ring road. As a distinct 'Garden Village', development here could not reasonably be described as contributing to the unrestricted sprawl of a large built up area</p>	<p><b>SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF URBAN SPRAWL</b></p>	<p><b>Criterion 4</b> <b>The village is a freestanding new settlement which helps to restrict urban sprawl.</b></p> <p>In comparison to a spatial distribution strategy resulting in additional development on the edge of the main urban areas, freestanding settlements help to restrict urban sprawl. CYC's Heritage Appraisal notes that it is key that the development is read as a settlement that is separate from York, and which sits within its own landscape context.</p> <p>Langwith will make a significant contribution towards meetings York's acute housing needs, in turn reducing pressure to deliver new homes via expansions to the existing urban area. It will be read as a distinct settlement that is separate from York, being well set back and screened from the A64, and sitting within its own landscaped context with clearly defined and defensible boundaries.</p> <p>Langwith will comprise a freestanding settlement with defined and defensible boundaries, helping to restrict urban sprawl, and therefore making a positive contribution towards this criterion.</p>
<p><b>Purpose 3:</b> Safeguarding the countryside from encroachment</p>	<p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in area of otherwise undeveloped open countryside will have an impact on purpose 3. However, a spatial distribution strategy reinforcing the freestanding and set back settlement pattern, is considered to be less harmful overall than additional incremental development located on the edge of existing urban areas.</p> <p><b>Delivery of ST15 has a potential to result in minor to significant harm in relation to countryside encroachment. However, significant effects are able to be mitigated land by maintaining land between the settlement edge (north) and A64 predominantly to help retain openness and views to ensure the landscape continues to function as part of the countryside and contributes to the character of the countryside.</b></p> <p>There are limited urbanising influences between the A64 and villages of</p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF ENCROACHMENT OVERALL.</b></p>	<p><b>ENCROACHMENT INTO THE COUNTRYSIDE AS A RESULT OF FREESTANDING SETTLEMENTS IN SPATIAL DISTRIBUTION TO INCLUDE FREESTANDING SETTLEMENTS HELPS TO AVOID HARM BY REASON OF</b></p> <p><b>Encroachment into the countryside as a result of freestanding settlements in York is accepted and necessary.</b></p> <p>The landscape of York is characterised by its openness and pattern of urban development set within a rural, countryside setting. Any freestanding development in an area of otherwise undeveloped open countryside will have an impact on Purpose 3.</p> <p>However, CYC have concluded that development in the general extent of the Green Belt is necessary to meet their objectively assessed housing needs and that exceptional circumstances exist to justify this release.</p> <p>Furthermore, a spatial distribution strategy reinforcing the established character of York being a compact core with surrounding freestanding settlements, is less harmful overall than additional incremental sprawl to the existing urban edges.</p> <p>Langwith would also provide a significant amount of publicly accessible open space equating to c. 40% of its site area (82ha), alongside a substantial Habitat Enhancement Area (HEA). A 192ha nature reserve (which will be one</p>

	<p>Wheldrake and Elvington to the south east. The land functions predominantly as arable farmland interspersed with tree-lined hedges and pockets of woodland. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness/connectivity with the wider landscape. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Similarly, Elvington Airfield, whilst previously development land (tarmac), retains openness and connection to the flat, open countryside.</p> <p>Harm is accepted in relation to purpose 3 in this location given that the development of a new freestanding settlement is an area perceived as countryside. However, ST15 is set back from the A64 to help retain the character and perception of the countryside in this location. There is also opportunities to continue accessibility to the countryside by strengthening linkages with the Minster Way and other rights of way. It is considered in the HIA that the significant/minor harm effects for the allocation boundary could be reduced to minor subject to the implementation of appropriate mitigation and treatment of the landscape.</p>		<p>of the largest in Yorkshire) (i.e. the HEA) will be established from the very outset of the settlement, with this area remaining solely in the Green Belt and having a function that is entirely appropriate for this status.</p> <p>Langwith combines a considerable portion of brownfield land (c. 50% of the settlement), with the 'greenfield' element comprising arable farmland interspersed with tree-lined hedges. Between the north of the settlement and the A64, the land mostly comprises arable farmland with small pockets of woodland and interspersed tree-lined hedges. These are connected to the main urban area via historic country lanes and green routes now connected over the A64. Whilst there are isolated farmstead and dwellings, these are sporadic across the landscape and retain a strong sense of openness.</p> <p>Similarly, the existing Airfield retains a degree of openness due to its flat nature, albeit this incorporates hardstanding and a perception of developed land. Langwith would utilise a considerable part of the Airfield (i.e. brownfield) land, preserve long views down the eastern part of the runway through the creation of a new open landscaped area, and restore the western part of the runway to greenfield land.</p> <p>Both the HEA and area of the western airfield to be restored to greenfield are shown below:</p>  <p>Langwith would incorporate strategic green infrastructure throughout the garden village, offering a legible and strong network. This will permeate the residential areas and form part of the movement network for pedestrians and cyclists.</p> <p>Langwith is designed to sit sensitively and appropriately in the countryside, with well-defined and highly defensible boundaries. It is well separated and screened from the A64 to the north. In this respect, it is considered that minor effects would arise and that these can be mitigated appropriately.</p>	<p><b>ENCROACHMENT OVERALL.</b></p>
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Sustainability Appraisal		Document Ref	Langwith
<p><b>ST15</b></p> <p>The approach taken by the Sustainability Appraisal is to appraise the site allocations and their reasonable alternatives in accordance with SP6 (Heritage Topic Paper Characteristics) and SP7 (characteristics relevant to keeping land permanently open to protect the historic character and setting of the city).</p>	<ul style="list-style-type: none"> <li>SA main report (2018)</li> <li>[CD008] Strategic Sites, page 116.</li> <li>SA Annex I: Appraisal of Strategic Sites(2018)</li> <li>[CD009b] ST15: West of Elvington Lane, Page 114.</li> <li>SA Annex K: Part 2 - Strategic Site Audit Trail (2018)</li> </ul>	<p>Langwith is considered to be more appropriate, sustainable and deliverable for a new settlement in this part of York.</p>	

This is taken into consideration under objectives 14 'Conserve or enhance York's historic environment, cultural heritage, character and setting and 15'Protect and enhance York's natural and built landscape'.	[CD009c] ST15:West of Elvington Lane, Page 195.	
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<b>Determining a clear, defensible boundary</b>		
<b>Langwith</b>		
ST15	Langwith	Langwith
<p>Site specific boundary considerations from Green Belt Purpose analysis.</p>	<p>No change. The same considerations apply to Langwith. Please refer to the main Report regarding the discussion on compactness, and the fact that it relates to a self-contained settlement rather than one of a concentric form in relation to villages (existing) and new freestanding settlements, unlike York itself where it relates to its historic form.</p>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 204ha and is well contained, being bounded by:</p> <ul style="list-style-type: none"> <li>- The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood.</li> <li>- The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield.</li> <li>- The north-eastern boundary follows the northern extent of Elvington Airfield and the SINC designation.</li> <li>- The eastern extent is bound by Elvington Lane.</li> <li>- The southern boundary follows the extent of Elvington Airfield.</li> <li>- The western boundary follows Langwith Stray (lane) before travelling straight to the southern extent of the airfield. This boundary would provide a clear distinction between the developed settlement to the east, and the land returned to greenfield to the west, as part of Langwith.</li> </ul>	<p>The proposed boundary has associations with historical features and has been established for a significant period of time. This definition is reinforced by containing the limits of the urban area in this location. The layering of different boundary features in the form of historical as well as current built and natural features offers strength and resilience to change.</p>
<p>Proposed boundary description and recognisability</p>	<p>(i) Must be set back from outer ring-road (A64) to maintain views and rural setting.  (ii) Must form an identifiable, compact self-sustaining settlement.  (iii) Must retain setting of York to the south and interrelationship between the land north and south of the A64 as perceived when travelling through; important to perception of compactness of the city in a rural setting.  (iv) Must respect historic recreational routes.</p>	<p>The site is broadly contained by recognisable and permanent landscape features. This is a large freestanding settlement covering 159ha and is generally well contained, being bounded on most sites by a combination of roads/tracks, deep ditches, trees, woodland, Elvington Airfield and a substantial hedgerow. The Minster Way PROW (linking two medieval Minsters at Beverly and York) (also called Baker Lane) forms the northern boundary of the site and the north-eastern boundary is bounded by Grimston Wood. The eastern boundary turns south from Baker Lane / Gipsey Corner (as described on the 1852 OS map) to follow historic field boundaries connecting to the northern extent of Elvington Airfield. The boundary travels straight to southern extent of the airfield on the south-eastern and southern boundaries. These are less well defined but follow the boundaries of the flora SINC designation on the airfield. The southern extent of the runway forms the southern boundary. The western edge continues north from the airfield following historic field boundaries to meet Langwith Stray (lane).</p>

<p>Permanence of proposed boundary</p>	 <p><b>Boundary 1</b> – The follows the alignment of the historic Minster Way and is defined by a hedge/tree-lined track. This boundary offers permanence</p> <p><b>Boundary 2</b> – This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This relates to Elvington Airfield. The eastern and western edges cut across the existing airfield and will need to be more clearly defined as a result of development. The southern airfield boundary offers permanence to the south.</p> <p><b>Boundary 4</b> - This follow historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p>	 <p><b>Boundary 1</b> – This follows the alignment of the historic Minster Way and is defined by a hedge, tree-lined track and Grimston Wood. This boundary offers permanence alongside separation and screening from the A64.</p> <p><b>Boundary 2</b> – This follows historic field boundaries present on the 1852 OS map. This boundary offers permanence.</p> <p><b>Boundary 3</b> – This follows the north boundary of Elvington Airfield and the SINIC and is restricted by the presence of Glenshire (an access road/track).</p> <p><b>Boundary 4</b> – This follows Elvington Lane and again offers permanence.</p> <p><b>Boundary 5</b> – This defines a clear separation between Langwith and the adjoining Yorkshire Air Museum, providing a permanent and clearly defined boundary.</p> <p><b>Boundary 6</b> – This follows the southern airfield boundary and offers permanence.</p> <p><b>Boundary 7</b> – This cuts across the airfield and will provide a clear permanent separation between the built settlement to the east, and the area of airfield returned to greenfield land to the west.</p> <p><b>Boundary 8</b> – This follows The western boundary follows Langwith Stray (lane) and offers permanence in this regard.</p>	<p>Permanence of proposed boundary</p>
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<p><b>Summary</b></p> <p><b>ST15</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement in this location:</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>	<p><b>Langwith</b></p> <p>Drawing on the assessment of Green Belt purposes, in order to mitigate the potential harm to the Green Belt the location of a freestanding settlement at Langwith</p> <ul style="list-style-type: none"> <li>- Replicates the settlement pattern of York's freestanding villages.</li> <li>- Is separated from the A64 to retain the setting of York to the south and interrelationship between the land to the north and south of the A64 as perceived when travelling through; important to the perception of compactness of the historic city in a rural setting (boundary 1).</li> <li>- The remaining Green Belt to the northwest and north of the freestanding settlement will have an increased</li> </ul>
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importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

importance in the rural setting of the city and in preventing future coalescence between the new northern boundary and the urban edge.

In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term. Alongside existing landscaped features and further landscaping to reinforce the site boundaries, the location of lower density development along the northern boundary will limit views of the settlement from the A64.

Strategic Policy 'SS13: Land west of Elvington Lane' in the submitted Local Plan (2018) sets out relevant planning principles detailing issues which must be addressed as part of the development. Where applicable, this policy seeks to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in masterplanning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, Design and Conservation to ensure high environmental quality and supports the character and setting of the city.

In summary, Langwith response positively to the purposes of the Green Belt given that:

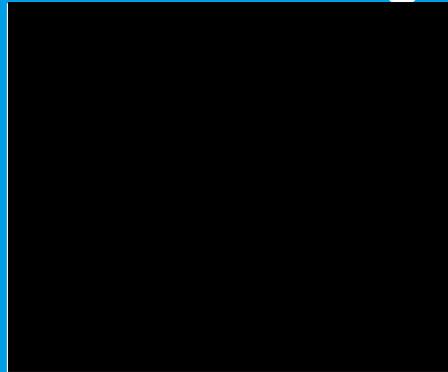
- It would check unrestricted sprawl in the future and ensure that the boundaries endure beyond the plan period. Delivering a freestanding new settlement reduces the need to provide housing in other more sensitive parts of the City, including as extensions to the existing area.
- The settlement is separate from the nearest smaller villages (including Elvington and Wheldrake), in addition to being set back considerably from the A64 to the north. It would not result in the coalescence of settlements or the merging of any neighbouring towns.
- Langwith would have well defined and highly defensible boundaries and in this respect will safeguard the countryside from inappropriate encroachment.
- Langwith responds positive to the special character of York by providing a freestanding settlement surrounding by a rural hinterland and preserving the compact nature of the York city core by avoiding the need for urban extensions.
- Langwith assists with urban regeneration by using a considerable amount of brownfield land (103ha) and returning the western part of the airfield (55ha) back to greenfield use.



Quod

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**Tim Waring**



**From:** [REDACTED]  
**Sent:** 07 July 2021 12:42  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205963

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Composite Modifications Schedule April 2021 (EX/CYC/58)

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## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Yorkshire Wildlife Trust considers that this new policy (GI2a Strensall Common SAC) strengthens the Local Plan and is based on the findings of the HRA. Yorkshire Wildlife Trust are fully supportive of the new policy.

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Yorkshire Wildlife Trust considers that this new policy (GI2a Strensall Common SAC) strengthens the Local Plan and is based on the findings of the HRA. Yorkshire Wildlife Trust are fully supportive of the new policy.

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** Yorkshire Wildlife Trust believes the plan was positively prepared by responding to previous consultation comments regarding concerns that there was insufficient evidence that impacts to Strensall Common SAC could be avoided. In addition, a new HRA has been produced which has led to the introduction of the new policy GI12a (Strensall Common SAC). The plan will be more consistently justified, effective and consistent with national and international policy on the protection of habitats. Yorkshire Wildlife Trust are fully supportive of the new policy.

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:**

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do wish to participate at hearing sessions, please state why:**

---

## Supporting documentation

Please provide any documents which support the comments made as part of this submission:

---

**From:** [REDACTED]  
**Sent:** 07 July 2021 12:50  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 205968

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Composite Modifications Schedule April 2021 (EX/CYC/58)

---

## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Yorkshire Wildlife Trust has previously stated that it considers that the inclusion of Moor Lane as the edge of the urban settlement is a logical approach. The Green Belt at this point maintains openness and the rural setting of York, prevents coalescence of urban areas and protects the Trust's reserve at Askham Bog from urban impacts. The proposed modification (PM 29) that the boundary should follow the carriageway to the south of Moor Lane as the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built-up area is reasonable.

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Yorkshire Wildlife Trust has previously stated that it considers that the inclusion of Moor Lane as the edge of the urban settlement is a logical approach. The Green Belt at this point maintains openness and the rural setting of York, prevents coalescence of urban areas and protects the Trust's reserve at Askham Bog from urban impacts. The proposed modification (PM 29) that the boundary should follow the carriageway to the south of Moor Lane as the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built-up area is reasonable.

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

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**Please justify why you consider the document to be sound:** Yorkshire Wildlife Trust has previously stated that it considers that the inclusion of Moor Lane as the edge of the urban settlement is a logical approach. The Green Belt at this point maintains openness and the rural setting of York, prevents coalescence of urban areas and protects the Trust's reserve at Askham Bog from urban impacts. The proposed modification (PM 29) that the boundary should follow the carriageway to the south of Moor Lane as the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built-up area is reasonable.

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or 'sound':**

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:** No, I do not wish to participate at hearings sessions

**If you do wish to participate at hearing sessions, please state why:**

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

---

**From:** [REDACTED]  
**Sent:** 07 July 2021 16:53  
**To:** localplan@york.gov.uk  
**Subject:** New Local Plan Consultation submission, ORGANISATION - reference: 206081

## Local Plan consultation May 2021

I confirm that I have read and understood the Local Plan Consultation Privacy Notice, and consent to my information being used as set out in the privacy notice.

Can we contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents?: yes

---

## About your comments

Whose views on the consultation documents do your comments represent?: My comments represent an organisation or group

---

## Organisation or group details

Title: [REDACTED]

Name: [REDACTED]

Email address: [REDACTED]

Telephone: [REDACTED]

Organisation name: [REDACTED]

Organisation address: [REDACTED]

---

## Key Evidence and Supporting Documentation

Which documents do your comments relate to?: Composite Modifications Schedule April 2021 (EX/CYC/58)

---

## Your comments: Legal Compliance of the document

**Do you consider the document to be legally compliant?:** Yes, I consider the document to be legally compliant

**Please justify why you consider the document to be legally compliant:** Yorkshire Wildlife Trust continues to support the removal of Queen Elizabeth Barracks (ST35/H59) from the allocations, which is supported by the latest HRA (October 2020) submitted as part of the evidence base for this consultaiton.

**Please justify why you do not consider the document to be legally compliant:**

---

## **Your comments: Duty to cooperate**

**Do you consider the document to comply with the Duty to Cooperate?:** Yes, I consider the document to comply with the Duty to Cooperate

**Please justify why you consider the document to be in compliance with the Duty to Cooperate:** Yorkshire Wildlife Trust continues to support the removal of Queen Elizabeth Barracks (ST35/H59) from the allocations, which is supported by the latest HRA (October 2020) submitted as part of the evidence base for this consultaiton.

**Please justify why you do not consider the document to be in compliance with the Duty to Cooperate:**

---

## **Your comments: Whether the document is ‘sound’**

**Do you consider the document to be ‘sound’?:** Yes, I consider the document to be sound

**Please justify why you consider the document to be sound:** Yorkshire Wildlife Trust continues to support the removal of Queen Elizabeth Barracks (ST35/H59) from the allocations, which is supported by the latest HRA (October 2020) submitted as part of the evidence base for this consultaiton.

**Please justify why you do not consider the document to be sound:**

---

## **Your comments: Necessary changes**

**I suggest the following changes to make the Local Plan legally compliant or ‘sound’:**

**If you are seeking to change the Local Plan, do you want to participate at the hearings sessions of the Public Examination?:**

**If you do wish to participate at hearing sessions, please state why:**

---

## **Supporting documentation**

**Please provide any documents which support the comments made as part of this submission:**

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[REDACTED]

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**From:** [REDACTED]  
**Sent:** 16 July 2021 15:28  
**To:** localplan@york.gov.uk  
**Cc:** [REDACTED]  
**Subject:** RE: City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)  
**Attachments:** 357387 Natural England advice.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.

Dear [REDACTED],

Thank you for consulting Natural England on the City of York Local Plan Proposed Modifications and Evidence Base Consultation, for videoconference last week and allowing us this extension. Please find attached our response confirming our support for the modifications and assessments regarding our remit.

If you have any further queries please do not hesitate to contact me.

Kind regards,

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

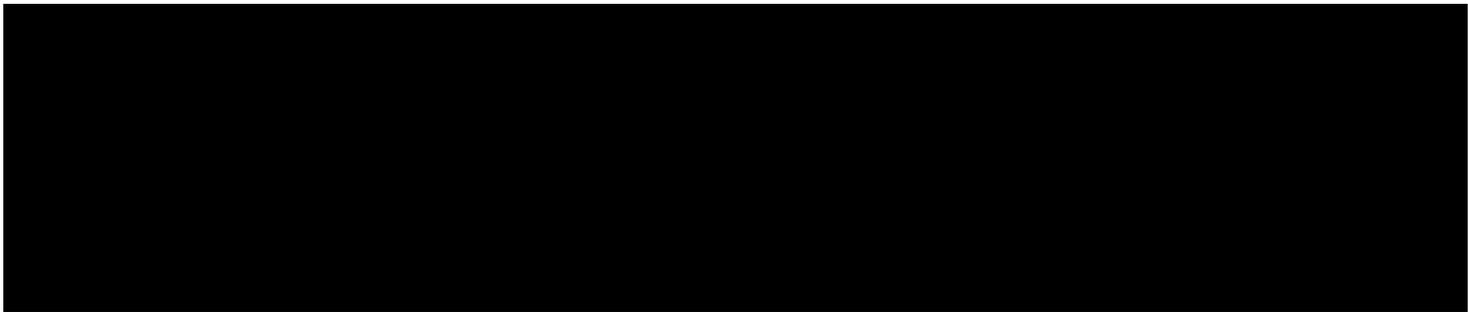
[REDACTED]

[REDACTED]  
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[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]



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**From:** [Redacted]  
**Sent:** 21 June 2021 16:38  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** FW: City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)

Hi [Redacted]

Please can this be logged and returned to AT3 mailbox?

Many thanks,

[Redacted]

---

**From:** [Redacted]  
**Sent:** 21 June 2021 16:35  
**To:** [Redacted]  
**Subject:** FW: City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)

Hi [Redacted],

As requested, please see our original consultation email sent out below.

Best regards

[Redacted]

[Redacted]

[Redacted]

Dear Sir/Madam,

**City of York Local Plan Proposed Modifications and Evidence Base  
Consultation (2021)  
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 (2021) to the City of York Local Plan and supporting evidence base. 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. Following the phase 1 hearing sessions held in December 2019 we are now publishing a series of proposed modifications to the City of York Local Plan and supporting evidence base.

This consultation gives York residents, businesses and other interested groups the opportunity to comment on the additional evidence and proposed modifications to the city's Local Plan prior to further hearing sessions as part of the Examination. 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 period for the proposed modifications starts on **Tuesday 25 May 2021 for a period of 6 weeks**. All consultation documents will be live on the Council's website ([www.york.gov.uk/LocalPlanConsultation](http://www.york.gov.uk/LocalPlanConsultation)). Printed copies of the consultation documents will be available at West Offices, if open in line with the Government's Coronavirus restrictions, by appointment only. Documents are also available to view electronically via Libraries, if open. Members of the library can book computer sessions up to a week in advance. Please see the Statement of Representation Procedure, which accompanies this letter for more information.

Representations must be received by **midnight on Wednesday 7 July 2021** and should be made on a response form. You can complete an online response form via [www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation). Alternative format response forms are available by request.

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 paragraph 182 of 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. For more information please also see our [Statement of Representation Procedure](#), which includes information regarding our privacy policy.

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 are also available on the Council's website at [www.york.gov.uk/localplan](http://www.york.gov.uk/localplan).

If you require any further information on the consultation please contact Forward Planning at [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or on (01904) 552255.

We look forward to receiving your comments.

Yours faithfully



Mike Slater  
Interim Assistant Director – Place Directorate

\*\*\*\*\*

Help protect the environment! - please don't print this email unless you really need to.

\*\*\*\*\*

This communication is from City of York Council.

The information contained within, and in any attachment(s), is confidential and legally privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s), please note that any form of distribution, copying or use of this communication, or the information within, is strictly prohibited and may be unlawful. Equally, you must not disclose all, or part, of its contents to any other person.

If you have received this communication in error, please return it immediately to the sender, then delete and destroy any copies of it.

City of York Council disclaims any liability for action taken in reliance on the content of this communication.

City of York Council respects your privacy. For more information on how we use your personal data, please visit <https://www.york.gov.uk/privacy>

This message has been sent using TLS 1.2 This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no

responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Date: 16 July 2021  
Our ref: 357387

  
City of York Council  
West Offices  
Station Rise  
York  
YO1 6GA  
[localplan@york.gov.uk](mailto:localplan@york.gov.uk)

## BY EMAIL ONLY

Dear 

**Planning consultation:** City of York Local Plan Proposed Modifications and Evidence Base Consultation (2021)

Thank you for consulting Natural England.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the proposed modifications and supporting updated Habitats Regulations Assessment and Sustainability Appraisal reports. Natural England is grateful for opportunities provided by informal consultation on the updated Habitats Regulations Assessment and a number of the proposed modifications during summer-autumn 2020. We are satisfied that our comments have been taken into account and that the proposed modifications are both sound and legally compliant with regards to our areas of interest. We have the following comments to make on the modifications.

### **PM58-PM61 Strategic Housing Sites**

Natural England notes that the revised Habitats Regulations Assessment recommends changes to the policy wording for policies SS9, SS10, SS11, and SS12 in order to specify the need for mitigation measures to avoid adverse effects on Strensall Common SAC.

Natural England welcomes modifications PM58-61 which clearly set out the requirements of a recreation and open space strategy helpfully cross refers to policies GI2a and GI6 for more detail as recommended in the updated Habitats Regulations Assessment.

### **PM65 Housing Allocations**

Natural England is pleased to see the additional modification to the supporting text for policy H1 which provides clarity regarding the approach to recreational disturbance for housing allocations in proximity to Strensall Common SAC.

### **PM70 New Policy GI2a Strensall Common Special Area of Conservation**

Natural England was consulted on the proposed wording of this policy as part of wider consultation on the Habitats Regulations Assessment. We consider that this policy satisfies the requirements set out in the Habitats Regulations Assessment and provides vital clarity on housing divulgement in proximity to Strensall Common SAC. We consider the approach taken to be proportionate, evidence

based and positive for nature conservation.

**PM71 New Policy GI2a Strensall Common Special Area of Conservation**

Natural England welcomes the justification paragraphs proposed for the supporting text for new policy GI2a. This is additional to the policy text Natural England was consulted on previously and we consider that it provides helpful context and explanation for the policy.

**PM101 Policies Map North**

Natural England notes the amendments made to the Green Belt boundary and has no concerns regarding Strensall Common SAC and SSSI.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter please contact [REDACTED]  
[REDACTED] For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED]

Yours sincerely

[REDACTED]

**From:** Cllr. N. Ayre  
**Sent:** 08 July 2021 10:57  
**To:** localplan@york.gov.uk  
**Attachments:** Local Plan Proposed Modifications Consultation Response Form 2021 - Housing suply.docx; Local Plan Proposed Modifications Consultation Response Form 2021 - Green Belt.docx

Kind Regards

Nigel

Nigel Ayre  
Executive Member Finance and Performance  
Liberal Democrat Ward Member Heworth Without City of York Council

# City of York Local Plan Proposed Modifications Consultation Response Form 25 May – 7 July 2021

OFFICE USE ONLY:

ID reference:

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

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 A carefully before completing the form. Please ensure you sign the form on page 2.**

**Please fill in a separate Part C for each issue/representation you wish to make.** Failure to fully complete Part C of this form may result in your representation being returned. Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

## Part A - How we will use your Personal Information

When we use your personal data, CYC complies with data protection legislation and is the registered 'Controller'. Our data protection notification is registered with the Information Commissioner's Office (ICO) – reference **Z5809563**.

**What information will be collected:** The consultation only looks at the specific proposed modifications and specific evidence base documents and not other aspects of the plan. The representations should therefore focus only on matters pertaining to those main modifications and documents being consulted upon. We are collecting personal details, including your name and address, alongside your opinions and thoughts.

**What will we do with the information:** We are using the information you give us with your consent. You can withdraw your consent at any time by contacting the Forward Planning team at [localplan@york.gov.uk](mailto:localplan@york.gov.uk) or 01904 552255.

The information we collect will be provided to the Planning Inspectors, together with a summary of the main issues raised during the representations period and considered as part of the Local Plan examination<sup>1</sup>. Response will be made available to view as part of the Examination process and 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. We will protect it and make sure nobody has access to it who shouldn't and we will not keep it for longer than is necessary.

<sup>1</sup> Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

We will not use the information for any other purpose than set out in this privacy notice and will not disclose to a third party i.e. other companies or individuals, unless we are required to do so by

law for the prevention of crime and detection of fraud, or, in some circumstances, when we feel that you or others are at risk.



You can find out more about how the City of York Council uses your information at <https://www.york.gov.uk/privacy>

We will also ask you if you want to take part in future consultations on planning policy matters including Supplementary Planning Documents and Neighbourhood Plans.

**Storage of information:** We will keep the information you give us in CYC's secure network drive and make sure it can only be accessed by authorised staff.

**How long will we keep the information:** The response you submit relating to this Local Plan consultation can only cease to be made available 6 weeks after the date of the formal adoption of the Plan<sup>2</sup>. When we no longer have a need to keep your information, we will securely and confidentially destroy it. Where required or appropriate, at the end of the retention period we will pass onto the City Archives any relevant information.

**Further processing:** If we wish to use your personal information for a new purpose, not covered by this Privacy Notice, we will provide you with a new notice explaining the purpose prior to commencing the processing and the processing conditions. Where and whenever necessary, we will seek your consent prior to the new processing.

**Your rights:** To find out about your rights under data protection law, you can go to the Information Commissioners Office (ICO): <https://ico.org.uk/for-the-public/>

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If you have any questions about this privacy notice, want to exercise your rights, or if you have a complaint about how your information has been used, please contact us at [information.governance@york.gov.uk](mailto:information.governance@york.gov.uk) on 01904 554145 or write to: Data Protection Officer, City of York Council, West Offices, Station Rise, York YO1 6GA.

1. Please tick the box to confirm you have read and understood the privacy notice and consent to your information being used as set out in the privacy notice

2. Please tick the box to confirm we can contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents.

Signature

Date

07/07/2021

<sup>2</sup>Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012.

# Part B - Personal Details



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

3. Personal Details		4. Agent's Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	Ayre	
Organisation (where relevant)		
Representing (if applicable)	Residents of Heworth Without	
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 Wednesday 7 July 2021, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
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- City of York Council Strategic Flood Risk Assessment (SFRA) Level 1 Report [[EX/CYC/60](#)]
- Sustainability Appraisal of the Composite Modifications Schedule (April 2021) [[EX/CYC/61](#)]

### **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.

You can use our online consultation form via [www.york.gov.uk/form/LocalPlanConsultation](http://www.york.gov.uk/form/LocalPlanConsultation) or send back your response via email to [localplan@york.gov.uk](mailto:localplan@york.gov.uk). **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response. We also need your confirmation that you consent to our Privacy Policy (Part A of this form).**

### **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 B of this form the group you are representing.

### **Do I need to attend the Public Examination?**

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Documents are also available to view electronically via Libraries, if open in line with Government Coronavirus restrictions. See our [Statement of Representations Procedure](#) for further information.

# Part C -Your Representation

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



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

Proposed Modification Reference:

EX/CYC/43a G - Housing Supply

Document:

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](http://www.york.gov.uk/localplan) or sent by request.

## 6. Based on the Proposed Modification or new evidence document:

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

Yes

No

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

Yes

No

### 6.(3) Please justify your answer to question 6.(1) and 6.(2)

As local Heworth Without councillor, I believe that the proposed modifications are legally compliant as there is clear downward pressure from demographic trends in the City of York. The 2018-based household projections see a need for 302 dwellings per annum over the 2017 to 2033 plan period and 352 dwellings per annum over the 2012 to 2037 period.

However, I believe the professional opinion of [REDACTED] (September 2020) [EX/CYC/43a] demonstrates legal compliance. Particularly noting the following points:

The 10-year migration variant results in a housing need of around 670 dwellings per annum regardless of the period examined. However, the economic-led housing need is greater still.

Based on the delivery of 650 jobs per annum the City would need to deliver 777 dwellings per annum over the plan period to meet the City's economic growth. This falls to around 766 dpa when looking over a longer period.

However, this would increase if the Council decided to provide a greater level of accommodation for these jobs within the City rather than rely on an external supply from neighbouring boroughs. And results in a marginally higher housing need in the City of 779 dpa over the Plan period and to 788 dpa over the 2012-37 period.

Given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa.

The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. To conclude, as local councillor, I believe that the housing need in the City would be sufficiently addressed through the proposed modifications, as it has not changed materially since the last assessment in January 2019. There is, therefore, no need for the Council to amend their current position based on this new data.

### **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

## **7. Based on the Proposed Modification or new evidence document:**

### **7.(1) Do you consider that the Local Plan is Sound?**

Yes  No

### **7.(2) Please tell us which tests of soundness are applicable to 7.(1):**

(tick all that apply)

<b>Positively prepared</b>	<input checked="" type="checkbox"/>	<b>Justified</b>	<input checked="" type="checkbox"/>
<b>Effective</b>	<input checked="" type="checkbox"/>	<b>Consistent with national policy</b>	<input checked="" type="checkbox"/>

### **7.(3) Please justify your answers to questions 7.(1) and 7.(2)**

Please use extra sheets if necessary

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**8. (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 7 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.**

N/A

**9. If your representation is seeking a change at question 8.(1)**

**9.(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.

**9.(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.

Representations must be received by Wednesday 7 July 2021, up until midnight.  
Representations received after this time will not be considered duly made.



# City of York Local Plan Proposed Modifications Consultation Response Form 25 May – 7 July 2021

OFFICE USE ONLY:

ID reference:

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

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2. Please tick the box to confirm we can contact you in the future about similar planning policy matters, including neighbourhood planning and supplementary planning documents.

Signature  
N

Date 07/07/2021

## Part B - Personal Details

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

3. Personal Details		4. Agent's Details (if applicable)
Title	Mr	
First Name	Nigel	
Last Name	Ayre	
Organisation (where relevant)		
Representing (if applicable)	Residents of Heworth Without	
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

# Guidance note

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# Part C -Your Representation

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



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

Proposed Modification Reference:

EX/CYC/59b ; EX/CYC/59c; EX/CYC/59d;  
EX/CYC/59e; EX/CYC/59f

Document:

Approach to defining York's Green Belt

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](http://www.york.gov.uk/localplan) or sent by request.

## 6. Based on the Proposed Modification or new evidence document:

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

Yes

No

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

Yes

No

### 6.(3) Please justify your answer to question 6.(1) and 6.(2)

As local councillor of Heworth Without, I believe that the proposed modifications are legally compliant based on the following criteria:

Purpose 4 Preserving the setting and special character of historic towns –

IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO PRESERVE THE SETTING AND SPECIAL CHARACTER OF THE HISTORIC CITY

The land should be kept permanently open as part of a wider view of a dense compact city in an open or rural landscape.

The land should be kept permanently open as part of maintaining the scale, identity and distribution of York and its districts and maintaining a connection to open and historic setting.

The land should be kept permanently open to aid the understanding of the historical relationship of the city to its hinterland.

The land needs to remain permanently open to aid the understanding or significance for the situation of a designated landscape, park or garden.

The land should be kept permanently open as part of maintaining the scale, identity and distribution of settlements around York and to maintain a connection to open and historic setting and to constrain development from coalescing.

The land is sensitive to understand the original siting and context of landmark buildings and their visual dominance of the Minster.

Purpose 1 Checking unrestricted sprawl

IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO PREVENT UNRESTRICTED SPRAWL

Land is connected to the urban area and therefore relevant for sprawl.

The land has an increased risk of sprawl occurring through the presence of existing structures.

Land is constrained by built development and strong boundaries on more than one side, and therefore contained and enclosed in a way which would prevent sprawl.

Land is constrained by strong boundaries on more than one side however there is still a risk of sprawl.

Purpose 3 Safeguarding the countryside from encroachment

IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO SAFEGUARD THE COUNTRYSIDE FROM ENCROACHMENT

The land is predominantly characterised by an absence of built development or urbanising influences and the land functions as part of the countryside in terms of relationships or acceptable uses within it.

The land contributes to the character of the countryside through openness and views.

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## 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

## 7. Based on the Proposed Modification or new evidence document:

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

Yes

No

### 7.(2) Please tell us which tests of soundness are applicable to 7.(1):

(tick all that apply)

**Positively prepared**

**Justified**

### 7.(3) Please justify your answers to questions 7.(1) and 7.(2)

Please use extra sheets if necessary

As local councillor of Heworth Without, I believe that the proposed modifications are sound based on the following criteria:

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**Furthermore, in the period of 30/06-07/07 a total of 187 York residents wrote to us in support of the proposed modifications, as a part of a city-wide survey. Therefore, these arrangements have the broad support of the local community.**

**8. (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 7 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.**

N/A

**9. If your representation is seeking a change at question 8.(1)**

**9.(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.

**9.(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.



**From:** Cllr. T. Fisher  
**Sent:** 07 July 2021 23:56  
**To:** localplan@york.gov.uk  
**Subject:** Green Belt boundaries in Strensall

Dear Sir/Madam,

I have tried to fill in the official form, completely without success. Please accept this as an alternative.

My comments concern the Green Belt boundary in Strensall.

- Document: GB Topic Paper Addendum Annex 4 EXCYC59f
- Page: Strensall, pg A4:245

Boundary 4: I strongly support the Council's preferred option of retention of the Green Belt boundary as being the rear of the properties along Southfields Rd and The Village, as on p268.

One alternative boundary considered is the York Scarborough railway line. I object to this on the grounds that:

- 1) The land between The Village and the railway has been the subject of planning appeals in 1994 (123 dwellings) and 2016 (11 dwellings on part of the site). Both were refused by planning inspectors.
- 2) The land has considerable wildlife value, including a pond inhabited by Great Crested Newts. Much of the site is within the foraging distance of this pond.

I support the Council's decision to reject this boundary

The other alternative boundary is Flaxton Rd. I STRONGLY object to this, as the land is far too close to Strensall Common SAC/SSSI. This is an extremely sensitive site and the Local Plan proposes a protection zone around it where development would be severely constrained. This is necessary to protect the extremely rare habitat of the Common.

Both alternative boundaries would harm the historic setting of the village and lead to sprawl.

- Proposed Modification reference: PM101
- Document: Composite Modifications Schedule EXCYC58
- Page: 76
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Boundary 5: I support the Council's decision to modify the Green Belt boundary from Ox Carr Lane to include the most densely developed parts of the Queen Elizabeth Barracks site.

This will allow a wider range of potential uses for the site when the MOD relinquish the site in 2024.

I request that you take these comments into account during your deliberations.

Yours truly

Anthony Fisher

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]