

YORK LOCAL PLAN – MATTER 2

STRATEGIC SITE ALLOCATION SITE REF. ST14
LAND WEST OF WIGGINTON ROAD

TW FIELDS

INTRODUCTION

- 1.1 This hearing statement is written on behalf of TW Fields in **support** of York Local Plan strategic site allocation Ref. ST14 Land West of Wigginton Road.
- 1.2 TW Fields are one of two developers (along with Barratt Developments plc) promoting the delivery of the strategic site allocation Land to the West of Wigginton Road (Ref. ST14). The two developers are working in collaboration to promote the allocation of the site. This statement should be read alongside our previous submissions to the Local Plan.
- 1.3 Land to the West of Wigginton Road, referred to as the Clifton Gate Garden Village scheme, is identified as a Strategic Allocation in the submitted York Local Plan (ST14) to deliver a new sustainable Garden Village of a minimum of 1,348 new homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, a health centre, affordable homes, elderly persons care homes, public open space, and recreational facilities. This Garden Village approach fully supports the Government's ambitions for Garden Villages.
- 1.4 The identified Vision of the Clifton Gate site is to deliver: -

A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time. A new village which is well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence. A place that feels a part of York but is still a separate place.
- 1.5 The Clifton Gate site is strategically located to the north of York, beyond the established boundary of the Outer York Ring Road. The site is separated from the existing urban edge and surrounding villages. The site's location respects the historic and landscape character of this area of the City. The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services at Clifton Moor. Importantly, there are no technical or environmental (built and natural) constraints that would preclude the development of the site.
- 1.6 The Clifton Gate site will make a significant contribution to meeting the City's housing needs over the emerging Local Plan period.
- 1.7 The Local Plan supports a development of 1,348 homes at the site. Whilst TW Fields supports the principle of this allocation, they consider that the defined boundary of the site is unsound and have therefore proposed a number of expansion options for the scheme, which they consider to be viable and deliverable alternatives.
- 1.8 In making representations to the Local Plan the developers have presented three potential development options to the Council to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes. The final resolution of the precise boundary of the new settlement will be determined at Phase 3 of the examination of the Local Plan.

- 1.9 Following a review of the Proposed Modifications to the Local Plan and the amended Evidence Base documents, the developer's stance has not changed. The proposed detailed boundaries of the site allocation should be expanded. The reasoning for which is provided within our previous submissions to the City of York Council and within our Phase 1 hearing statements.
- 1.10 Notwithstanding the above, it remains the developer's intention to work with the Council to agree a Statement of Common Ground ahead of the Phase 3 hearing sessions.
- 1.11 This statement seeks to respond to **Matter 2** of Phase 2 of the York Local Plan Examination in Public. For brevity, where possible we refer to our previously submitted Phase 1 Hearing Statement and representations to the Council's Proposed Modification & Evidence Base consultation. These two documents are enclosed with this statement for ease of reference.
- 1.12 We respond below to the Inspector questions in respect of the Local Plan's Housing Need and Requirement.

THE OBJECTIVELY ASSESSED HOUSING NEED (THE 'OAHN') & THE HOUSING REQUIREMENT

- 2.1 It remains TW Fields' view that the Local Plan's proposed Objectively Assessed Housing Need (OAHN) of 790 homes per annum is not justified by compelling evidence on account of it not aligning with the methodological requirements established by national planning guidance. A more accurate representation of the OAHN for the City would lead to an increase in the number of homes that the Local Plan should seek to deliver.
- 2.2 We maintain our objection to the Council's continued use of the 2018 projections despite the PPG requiring the continued use of the 2014 based household projections. Our objection relates to the following: -
- The 2014 PPG was based on a CLG methodology for projections that applied long-term trends in household formation going back to 1971, rather than confining itself to trends from 2001 (as the 2018-based projections do).
 - ONS have published their own commentary about the later projections casting doubt over whether lower projections mean less housing is needed.
 - The revised PPG uses the 2014-based SNHP as the baseline for the standard method to provide stability, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. The PPG considers that the 2018-based SNHP "*does not provide an appropriate basis for use in the standard method*".
- 2.3 With regards to the Council's Housing Needs Update (Doc.Ref EX/CYC/43a) and the resulting proposed modifications relating to the annual net housing provision in Policy SS1, it is our view that the housing requirement is increased to reflect the most up to date Standard Method.
- 2.4 The current Local Housing Need (LHN) for York generated by the standard methodology is calculated using the 2014-based household projections for 2021-2031, which equates to household growth of 809 per annum, plus a market signals uplift of 25.25% equating to **1,013 dpa**.
- 2.5 It can be argued that the proposed Housing Requirement of the Local Plan would only result in a continuation of the current undersupply of homes within the City, would exacerbate housing affordability issues, increase unsustainable commuting patterns, and adversely impact on the Council's desire of building a strong, competitive economy.

- 2.6 The implications of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York and will lead to the worsening of an already severe affordability situation. Creating further issues in respect of the need to make up any shortfall within future versions of the Local Plan and with it the likely need to review the newly defined Green Belt boundaries almost immediately.
- 2.7 Evidence of the delayed impact of the Local Plan on the delivery of new homes is illustrated in the Council's Housing Monitoring Report dated October 2021 (enclosed in Appendix A). The evidence presented identifies that York has under-delivered housing in 12 of the past 17 years, resulting in an under-delivery of around 1,950 homes over this period of time.
- 2.8 Furthermore, In the two and a half years since the Phase 1 hearing sessions took place, the Council delivered 560 net additional homes in 2019-2020; 622 net additional homes in 2020-2021; and 160 net additional homes in the first 6-months of the 2021-2022 period. A significant shortfall when measured against the Local Plan's proposed housing requirement and the Standard Method calculation for York. Indeed, the latest 6-month figures are very worrying.
- 2.9 When compared against the Local Plan's proposed housing requirement of 822 net dwellings per annum over this 2.5 year period ($822 \times 2.5 \text{ years} = 2055$), there is a further shortfall of 713 homes to add to that already calculated from the beginning of the Local Plan period.
- 2.10 Rather staggeringly, this shortfall of 713 homes over the last 2.5 year period is almost the equivalent of one year of the Local Plan's housing requirement (87%). This position will only worsen until the adoption of the Local Plan.
- 2.11 There is also a concern with the type of new homes being delivered in York, with a significant proportion of housing schemes in the last 5-years being City Centre apartment development or Student Accommodation on account of the unavailability of appropriate sites to deliver much needed family housing. The ability to meet identified housing needs for families, and the proportionate provision of affordable homes, will simply not be met until the Local Plan is adopted.
- 2.12 We therefore wish to maintain our previously presented case for the expansion of the Clifton Gate site to deliver at least 1,725 homes in order to meet the City's Local Housing Needs.