

CITY OF YORK LOCAL PLAN EXAMINATION

PHASE 2 HEARINGS

REPRESENTATIONS BY FULFORD PARISH COUNCIL

MATTER 5 – HOUSING LAND SUPPLY

MARCH 2022

Q5.1: The Provision of an Appropriate Policy Framework for Housing.

- 1 For the reasons given under Matter 4, FPC considers that Policy SS1 (either as submitted or proposed to be modified) does not provide an adequate policy framework for the delivery of housing.
- 2 The housing policies of the SLP provide no guidance about how planning applications for housing on unallocated sites (windfall sites) will be treated, including whether any distinction will be made between different types of site (such as previously developed land or greenfield) or in different parts of the City (such as the Main Urban Area or larger and smaller villages).
- 3 Policy SS1 (as proposed to be modified) states that the Plan "*will prioritise making the best use of previously developed land.*" However, this prioritisation is not carried through into the phasing of the housing allocations set out in SLP Table 5.1 (which forms part of Policy H1) which shows all the major greenfield peripheral housing sites as phased from Year 1 onwards. There is no attempt to hold back any greenfield site in order to promote the early development of previously developed land, including the key regeneration sites. As such, Policy H1 is not consistent with Policy SS1. The only sites listed for later phases in Table 5.1 are previously developed.

Q5.2: The Supply of Housing Land.

- 4 FPC agrees with the mathematics of the Inspectors that the latest housing trajectory shows a total housing supply of 17,795 dwellings over the Plan period (2017-2038). This is some 4,643 dwellings in excess of the Plan's requirement of 13,152 dwellings. FPC accepts that there will be a degree of non-implementation. For the same reason, the

Council has applied a 10% non-implementation rate to all commitments and allocations. Even when this is applied, it still produces an over-supply of 3,351 dwellings. This is equivalent to more than 25% of the requirement or 4.1 years supply.

- 5 For the longer period 2017-2038, the Council's housing trajectory shows a total housing supply of 22,268 dwellings which reduces to 20,627 dwellings when the 10% non-implementation rate is applied. This represents an over-supply of 3525 dwellings supply above the requirement of 17,102 dwellings for the period, equivalent to some 4.5 years supply. In addition the housing allocations will produce a further 1541 dwellings beyond 2038 which is equivalent to nearly 2 years supply.
- 6 The Council has never sought to explain why this high level of over-supply is necessary or desirable. Much of the over-supply is on greenfield sites which the Council accepts meet important Green Belt purposes. The result of the over-supply will be unnecessary harm to Green Belt purposes and the diversion of demand away from the brownfield sites which Policy SS1 seeks to prioritise. The over-supply will also frustrate the fifth Green Belt purpose which is *"to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*
- 7 The quantum of the SLP housing supply (and its over-provision) has not been subject to Sustainability Assessment which if properly undertaken would have found significant harm to many of the SA objectives, including SA Objective 9 which is to *"use land resources efficiently and safeguard their quality."*
- 8 FPC considers that the number and amount of allocations made by the Plan should be significantly reduced even if the housing requirement remains the same.

Q.5.3: The Windfall Allowance.

- 9 This is a question initially for the Council to answer.

Q.5.4: The Reasonableness of the Windfall Allowance.

- 10 FPC supports the increase in the windfall allowance proposed by the Council. However, it considers that the allowance should be further increased. The move to Working-from-Home will significantly increase the amount of existing employment floorspace which

comes forward for conversion and redevelopment for housing. This will substantially boost windfall numbers over the remainder of the Plan period. FPC suggests a windfall allowance of 220 dwellings per annum.

Q.5.5: The Realism of the Planned Housing Development Rates

11 FPC considers that the planned completion rates for ST15 (West of Elvington Lane) are totally unrealistic. EX/CYC/69 shows completions starting in 2024/25 and increasing over an 8 year period to 280dpa by 2032/33. On this basis, the site is shown as providing 1260 dwellings over the Plan period.

12 This is highly unlikely for the following reasons:-

1. The Local Plan is unlikely to be adopted before mid-2023 (on the basis that at least one further round of public consultation will be required on proposed modifications).

2. An outline planning permission will need to be secured including full details for the required 1.5km access road and grade-separated junction on to the A64. Significant negotiations will be required with Highways England as well as important consultees including Natural England. Based upon similar schemes in York and elsewhere, the planning application process is likely to take at least two to three years after Plan adoption.

3. According to Policy SS13, development could not start until the new junction and access road onto the A64 is completed. These works are likely to take a minimum of two years to complete after planning permission and potentially much longer. The numbers that could be accessed off Elvington Lane in its current state would be very limited (even if it is viable to construct the required 800m access road and new junction). On this basis, housebuilding is unlikely to start until 2028/29 at the earliest. Furthermore, Policy SS13(vii) requires that the ecological mitigation and compensation measures are delivered 5 years before commencement of development. This would potentially push back a start until 2029/30 at the earliest.

4. The site is remote from services and facilities. Until these are in place and the development is becoming mature, the site is unlikely to be attractive to housebuyers and would not support more than two or three housebuilders operating at

any time, especially in light of potential competition elsewhere in the south-eastern quadrant of the City (including from ST7).

- 13 There is also the whole issue of the viability and deliverability of the site to be resolved. The site is not deliverable without massive public sector funding which is not in place.

Q.5.6: The Realism of the Housing Trajectory.

- 14 EX/CYC/69 does not provide any context for considering whether sites are deliverable within the meaning of NPPF1 footnote 11. FPC must also emphasise that none of the other documentation provided by the Council directly addresses the issues of whether the strategic sites are deliverable, including the issue of viability.

Qs.5.7 to 5.12: Five Year Supply

- 15 These are questions initially for the Council to answer.