

MATTER 6



JohnsonMowat
Planning & Development Consultants

Examination of the City of York Local Plan

Matters, Issues and Questions for the Examination

Phase 2 Hearings

Matter 6 – Infrastructure Requirements, Delivery and Development Viability

March 2022

CLIENT: Redrow Homes



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1.0 INTRODUCTION

- 1.1 This response has been prepared on behalf of Redrow Homes in relation to their land interests at Monks Cross, York which is proposed allocation ST8 and land immediately west of, in the Publication Draft Local Plan.
- 1.2 An Outline Planning Application for the development of circa 970 dwellings including infrastructure, open space, primary school, associated community facilities, convenience store and Country Park was submitted on behalf of Redrow Homes (Yorkshire) Limited in January 2018 on the emerging Local Plan ST8 site (18/00017/OUTM). The application was appealed for non-determination Appeal Ref: APP/C2741/W/21/3282969. A public inquiry was held over 4 days 25 – 28 January 2022. At the stage of closing statements, both appellant and LPA were supportive of an approval subject to S106. The decision now stands with the Secretary of State.
- 1.3 Previous submissions have been made to the Local Plan and attendance at the Phase 1 Hearings. The content of previous submissions remains relevant, including the Publication Draft submissions in February 2018, July 2019 Proposed Modifications, Phase 1 Hearings, and the June 2021 Modifications and Evidence Base Consultation. In addition to this statement relating to Examination Matter 6, it should be noted that statements have been prepared for Matter 1, 2, 4, 5, 7 and 8 on behalf of Redrow Homes and Johnson Mowat will be representing Redrow Homes at the Phase 2 Examination Hearing sessions relating to Matters 1, 2, 4, 5, 6, 7 and 8.



2.0 TEST OF SOUNDNESS

2.1 The City of York Local Plan is being tested against the 2012 National Planning Policy Framework (NPPF 2012) which at Paragraph 182 states that:

“The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers 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.”



3.0 RESPONSE TO INSPECTOR'S QUESTIONS

Matter 6 – Infrastructure Requirements, Delivery and Development Viability

- 6.1 What are the key infrastructure requirements for the successful delivery of the housing and economic development planned?**

We consider key infrastructure includes schools, health, transport (and in particular fixing the Outer Ring Road) and greenspace.

- 6.2 Does the Plan take a justified and suitably evidenced-based approach to infrastructure requirements and delivery? Does it set out the infrastructure requirements arising from the level of growth / new development proposed in the Plan in sufficient detail?**

Paragraphs 15.14 and 15.15 of the submitted Plan provide a useful starting point. However, it is not sufficiently detailed in order for us to understand the infrastructure requirements for each of the site allocations proposed.

There are anomalies in the Council's evidence. For example the Infrastructure Delivery Plan January 22 Update doesn't include a Primary School on Strategic Site ST7, which is the same as the 2018 Infrastructure Delivery Plan. However, the policy text for ST7 suggests it is required (in combination with ST8). The current agreed position in relation to ST8 is that a Primary School will be provided on site.

- 6.3 The Council has provided an update to the infrastructure requirements for the planned growth set out in the Plan [EX/CYC/70] which builds upon the Infrastructure Plan 2018 (the IDP) [SD128] that was submitted with the Plan and a subsequent update to Annex 4 of the IDP, published and submitted in November 2018 [EX/CYC/7b and EX/CYC/7c]. What reassurances are there that the elements set out in this evidence can, and will, be delivered when and where they are needed?**

The Council needs to be clearer over the timing of both Ring road works and also school delivery, where academy status is to be achieved.

- 6.4 Has the cost of these infrastructure elements been estimated reasonably, robustly and with justification and are appropriate and realistic funding sources identified?**

Support funding for sites with schools is absent.



An update on the Ring road works is necessary.

6.5 Does the evidence base support the site allocations overall and demonstrate that they are viable and deliverable, having regard to all of the policies contained within the Plan, including in relation to the provision of necessary infrastructure?

While we have confidence the sites are viable with the infrastructure requirements referenced in the site specific policy e.g. SS10, there are many other development control policies that may seek developer contributions which are not referenced.

6.6 In terms of the provision of necessary infrastructure, are the viability assessments contained within the evidence base sufficiently robust and are they based on reasonable assumptions? In particular:

a) do the viability assessments adequately reflect the nature and circumstances of the proposed allocations?

b) has the cost of the full range of expected requirements on new housing been taken into account, including those arising through policy requirements identified by the Plan (e.g. affordable housing and infrastructure)?

c) have the costs of upgrading the strategic transport infrastructure and public transport services been suitably identified in the Infrastructure Delivery Plan (IDP) and have necessary mechanisms for securing it been incorporated into the Plan? If not, why not and what are the implications for the delivery of the Plan?

d) have the costs of meeting education needs been identified in the IDP and has the necessary mechanism for funding been secured to provide for those needs? If not, why not and what are the implications for the delivery of the Plan?

e) have the costs of ecological mitigation measures been identified in the IDP and has the necessary mechanism for funding been secured? If not, why not and what are the implications for the delivery of the Plan?

f) does the evidence base demonstrate that the above costs would not threaten the delivery of the housing and economic growth planned?



g) is there a reasonable prospect that the housing and economic development sites identified will come forward for development when anticipated during the Plan period?

h) the Council is requested to provide a clear explanation as to what methodology has been used to assess viability and how infrastructure requirements have formed a part of that methodology.

These questions are matters for the Council to answer. We have tested the requirements for ST8 and can confirm the site is viable with 30% affordable housing, a new primary school and highway works.

6.7 Is the development proposed in the Plan, as set out in Policy SS1, financially viable?

6.8 In what way does the Plan and its policies provide a clear and effective framework for securing the necessary infrastructure or other obligations to support or mitigate the effects of development?