

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: Taylor Wimpey



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1.0 INTRODUCTION

- 1.1 This response has been prepared on behalf of Taylor Wimpey in relation to their land interests at Strategic Site ST7, east of Metcalfe Lane, York which is a proposed allocation in the Publication Draft Local Plan.
- 1.2 There are three parties with interests in proposed allocation ST7, who have in the past submitted individual and joint representations to the Local Plan as well as attended the Phase 1 Hearings. The recent submissions to the June 2021 Updated Evidence consultation were presented as a consortium response with the following three companies represented.
- **Barratt David Wilson Homes (Barton Willmore)**
 - **Taylor Wimpey (Johnson Mowat)**
 - **TW Fields (PB Planning)**
- 1.3 This response included a critique of the housing requirement undertaken by Lichfields, as well as input from SLR and Pegasus in relation to landscape and heritage considerations of the updated evidence.
- 1.4 Whilst the ST7 developers support the principle of the ST7 allocation disagreement remains with the size of the proposed ST7 allocation as currently drafted. The primary objections remain as follows:
- The site access roads are too long and no doubt costly. Extending the limit of development in the allocation to reduce the access roads would improve deliverability.
 - The developers do not accept the land between the allocation and the edge of the main urban area needs to be Green Belt and collectively request the Council entertain a slightly expanded ST7 (expanded westwards) to marginally reduce the gap whilst maintaining a degree of separation.
 - Whilst the developers are prepared to support the garden village concept in its current shape and form, however the dwellings likely to be delivered are unlikely to be able to sustain the community facilities sought by the Council which then may undermine the principal of the garden village. In short, the allocation needs to be slightly larger.



- 1.5 Alternative development options have been presented to the Council for a new Garden Village of either 845 homes, 975 homes or 1,225 homes. The final detail of the ST7 allocation will be determined at the Phase 3 Local Plan Examination Hearings.
- 1.6 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 Taylor Wimpey and Johnson Mowat will be representing Taylor Wimpey 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 an on-site Primary School on Strategic Site ST7, which is the same as the 2018 Infrastructure Delivery Plan. However, the policy text for ST7 (Policy SS9) suggests it may be required on-site (in combination with ST8). The current agreed position in relation to ST8 is that a Primary School will be provided on site.

In relation to ST7, the ST7 developers support the provision of required primary school places to be secured via developer contributions. Site ST7 is located within close and accessible proximity to Hempland Primary School and Saint Aelred's roman Catholic Primary School. Should the number of homes at Site ST7 be increased via the Local Plan, the ST7 developers will work with the Council in relation to primary education provision for the 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. SS9 and 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.

Similarly, the ST7 developers have tested the requirements for ST7, which have been taken into account when undertaking their own viability appraisal for the site.

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?