

WRITTEN STATEMENT RESPONDING TO THE  
INSPECTORS MATTERS, ISSUES & QUESTIONS FOR  
PHASE 2 HEARINGS

ON BEHALF OF

WESTFIELD LODGE & YALDARA LTD

REGARDING

LAND ADJACENT TO GREYSTONE COURT, HAXBY,  
YORKS

Site H37/ SITE 6

## 1.0 Overview

Our clients Westfield Lodge and Yaldara Ltd have been closely involved in the promotion of the subject site (H37) for Housing and Public Open Space through the emerging Local Plan since the start of the Local Plan Review in September 2012. Please refer to all previous related representations submitted in relation to this site.

This subject site was identified in the Preferred Options Consultation Draft of the York Local Plan 2013 under Policy H3 as Site H37 for development for housing. At this time York CC did not consider it necessary to retain this site within the draft Green Belt. The site has since been proposed to be removed from the proposed allocated housing sites and to be included as Green Belt formally for the first time in the current draft Local Plan. Notwithstanding York Council's Planning Officers again seeking to support the sites exclusion from the draft Green Belt and the sites inclusion in the Local Plan (LPWG 23<sup>rd</sup> Jan 2018) housing allocations. This site has twice been considered technically appropriate for housing development and justified for removal from the draft Green Belt by Planning Officers of York Council throughout this Local Plan programme. Moreover, the subject site is currently excluded from the Area of Coalescence.

Since the start of the preparation of this Local Plan, there has been a significant reduction in the Council's forecast OAHN figures, yet affordability in the district still remains challenging and the 5 year land supply cannot be met currently.

Consistent with all previous representations submitted since 2018, we do not consider that the draft Local Plan meets the national tests of soundness in relation to the OAHN nor in relation to the housing allocations or the defining of Green Belt boundaries.

To clarify the client's position, these representations consistently seek to specifically:

- (i) Remove the subject site H37/Site 6 Haxby from the York Green Belt which is being formally defined for the first time. This site has been considered appropriate for development by York Council previously and evidently that contradicts the site suitability for retention as Green Belt in perpetuity. This land at the margins of Haxby, is modest in size, does not need to be kept permanently open and has been removed from the Area of Coalescence. It should at the very least, be re-allocated as White Land or Safeguarded land for future development.
- (ii) Furthermore, the site should be reinstated as a Housing Allocation H37 for development together with the benefit of the dedication in perpetuity of a sizeable area of Public Open Space for Haxby residents. The site is deliverable in the short term and all technical matters have been addressed in principle through a previous pre-application submission and previous representations to the Local Plan. This has been fully documented in previous representations. Accordingly, this deliverable, short term site would help to ease the current short

supply of housing and help with the affordability crisis in York area, in a sustainable location.

## **2.0 Response to Matter 2 of MIQs for Phase 2 Hearings**

As referred to repeatedly throughout our representations on our client's behalf since 2018 and in response to Sec 2.2, we are concerned that the proposed OAHN figure has not been arrived at robustly. We consider it does not reflect the true circumstances of both the current and future need for housing, nor does it sufficiently address the historic undersupply of housing. The proposed OAHN figure is significantly below the earlier OAHN figures promoted at the beginning of the Local Plan process by York City Council and significantly below the OAHN figure calculated using the Standard Method. Simultaneously, there is currently less than a 5-year land supply for housing and an affordability crisis in the district. It is fundamental to address this matter now to ensure there is a sufficient provision of housing land to meet this local demand, in line with the Government's overarching objective to provide sufficient new housing. The alternative is that the Local Plan when adopted is already out of date and requires an urgent review. The weight of objection received to this matter alone demonstrates the significant flaws in the current proposed OAHN figure which is neither considered to be robust nor adequately justified.

## **3.0 Response to Matter 4 of MIQs for Phase 2 Hearings**

In response to Sec 4.4 and as advised previously in our representations, the spatial strategy applied to the planned future development concentrates on very large, strategic sites requiring significant initial infrastructure investment before any housing can be delivered. These sites are identified in and around York City Centre thereby further increasing the intensity of development on a transport network which is already under strain. A reasonable alternative strategy would be to promote a number of more modest and short or medium term deliverable housing sites within alternate sustainable locations, such as Haxby and other sustainable, surrounding settlements which would have the effect of spreading the overall impact on the transport network more evenly, rather than concentrating the cumulative impact so heavily on York City Centre where the adverse impacts are likely to be severe.

In response to Sec 4.12 (a) evidently the site has been removed from the Area Preventing Coalescence. Demonstrably, it does not therefore need to be kept permanently open to prevent urban sprawl or neighbouring towns merging. Haxby already extends southwards in the vicinity of the site. This site nestles within this area, follows the contours of the built edge and is proposed to be surrounded by public open space to create a permanent and defensible Green Belt boundary in perpetuity. It will therefore preserve the historic setting of York.

In response to 4(b) we have submitted evidence previously confirming that the site does not serve the five purposes of including land in the Green Belt. This was accepted by York CC and its Officers previously when the site was proposed for housing. It is inconsistent and unreasonable to now support an argument to formally include the site within Green Belt

land permanently. At the very least, this site should be shown as White Land and be excluded from the Green Belt.

In response to 4 ( c ) we agree that exceptional circumstances do not need to be demonstrated to exclude this site from the draft Green Belt and include the site as a Housing allocation. This is a reasonable alternative site which could be allocated for housing as previously justified and proposed.

#### **4.0 Response to Matter 7 of MIQs for Phase 2 Hearings**

For the reasons set out in Sec 2.0 above and as submitted in previous evidence, in response to Sec 7.2 we are consistently of the view that the subject site should not be formally included in the Green Belt, for the first time, as demonstrably it is not necessary to keep the site permanently open. As a matter of principle, this site should at the very least be identified as White Land or safeguarded land for future development.

Furthermore, in view of the evidence submitted above and in previous representations, in response to Sec 7.3, we do not consider that the approach to the setting of Green Belt boundaries, particularly in relation to southern Haxby, is clear, justified, effective or consistent with national policy and justified in all our previous submissions.

We reserve the right to submit further evidence to the Phase 3 Hearings in due course.

#### **5.0 Conclusions**

- These representations demonstrate that the draft Local Plan fails the 4 tests of soundness, namely: positively prepared; justified; effective and consistent with national policy.
- In general terms, the proposed draft policies are fundamentally flawed in relation to the (i) proposed OAHN figure (ii) in relation to the spatial strategy applied to planned development and (iii) in relation to the approach to setting detailed Green Belt boundaries for the first time.
- More specifically, it follows that Site H37/ Site 6 should be identified as it comprises a modest, deliverable, short term housing site with the associated benefit of the provision of dedicated public open space for the local community of Haxby. This in turn creates a defensible, permanent green belt boundary in perpetuity whilst helping to address the under supply of housing.
- If the subject site (H37) is not reinstated as a housing allocation, notwithstanding its previous identification for housing in earlier draft Local Plan versions, we request that the site is allocated as White Land or “safeguarded land” for future growth, as it should not, in principle, be included in Green Belt.

