

MATTER 8



JohnsonMowat

Planning & Development Consultants

Examination of the City of York Local Plan

Matters, Issues and Questions for the Examination

Phase 2 Hearings

Matter 8 – Climate Change

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 8, it should be noted that statements have been prepared for Matter 1, 2, 4, 5, 6 and 7 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 8 – Climate Change

Further to our initial Question 1.8 in the Matters, Issues and Questions for Phase 1 of the hearing sessions, we have the following question relating to climate change matters.

- 8.1 Neither the Planning and Compulsory Purchase Act 2004, the Town and Country Planning Act 1990, nor the associated Regulations, set out specific requirements or targets for local plans in relation to climate change. In light of this, do the Government's wider climate change commitments have any bearing on the legal requirements for, or soundness of, the Plan? If so, what changes are required to make the Plan legally compliant and/or sound and why are they necessary**

It is our opinion that Building Regulation changes 2021 and impending 2025 Future Homes Standards are sufficient to deliver the necessary climate change requirements for the CYC Local Plan. As such, the Council's requirements under policies CC1, CC2 and CC3 are redundant in so far as they relate to new residential development. Further, the policies, as written are unable to respond to future Building Regulations changes, resulting in the policies potentially becoming out of date during the Plan Period.