

HEARING STATEMENT

CITY OF YORK LOCAL PLAN EXAMINATION

MATTER 1: STRATEGIC VISION, OUTCOMES
AND DEVELOPMENT PRINCIPLES

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Carter Jonas

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1.0 INTRODUCTION

- 1.1 Carter Jonas LLP (CJ) welcomes the opportunity to participate in the City of York Local Plan Examination in Public (the EiP) on behalf of Picton. This statement responds to selected questions set out within Matter 1: Strategic Vision, Outcomes and Development Principles of the Inspector's Matters, Issues and Questions.
- 1.2 The Inspector's Issues and Questions are included in bold for ease of reference. Where a specific question is not covered Picton has no further comment to make as part of this Hearing Statement.
- 1.3 This Hearing Statement is pursuant to and cross-references with previous representations by Carter Jonas in respect of the Pre-Publication Draft (Regulation 18) and Main Modifications (Regulation 19) consultations in July 2019; and City of York Local Plan Proposed Modifications and Evidence Base Consultation (Regulation 19) in July 2021.
- 1.4 Picton has a controlling interest in the land at Kettlestring Lane, Clifton Moor, York, which Carter Jonas continues to promote for release from the General Extent of Green Belt and as an allocation for housing, with the proposed inner green belt boundary being drawn along the A1237 York Outer Ring Road. The land is Site Reference 959 within the Strategic Housing Land Availability Assessment (SHLAA) (2018).

2.0 MATTER 1: STRATEGIC VISION, OUTCOMES AND DEVELOPMENT PRINCIPLES

MIQ 1.1 Does the Strategic Vision, Outcomes and Development Principles set out within Section 2 and provided in policies DP1, DP2 and DP3 of the Plan provide a clear and appropriate framework for the strategic policies set out primarily within Sections 2 and 3 of the Plan?

- 2.1 As previously highlighted the Vision and Outcomes on page 16 of the Plan are generic and fail to highlight or even reference the need for housing growth to assist in delivering and underpinning sustainable development aims and objectives.
- 2.2 We note the explanation of City of York Housing Needs has been updated PM3 (paragraph 2.5) as part of the Proposed Modifications (June 2019) to align with the updated housing requirement evidenced through the City of York – Housing Needs Update January 2019 published by GL Hearn.
- 2.3 For consistency and clarity, the Vision and Outcomes needs to better align with the Development Principles and policies DP1, DP2 and DP3 and include reference to addressing housing and employment needs. This should also make reference to the need to provide affordable housing and diversify the housing market. Given the recent Environment Bill the Vision, Outcomes and Development Principles and Policies DP1, 2 and 3 should also be referenced to securing biodiversity net gain.
- 2.4 We continue to consider however that the Vision and Outcomes are not justified or effective as they are not backed up by sufficient evidence and positive policies to meet housing need.

MIQ 1.2 Are the Development Principles set out in the Plan justified, effective and in accordance with national policy?

- 2.5 Paragraph 152 of the NPPF (2012) requires Local Plans to be *“prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies of the Framework, including the presumption in favour of sustainable development”*.
- 2.6 In broad terms the Development Principles set out within Policy DP1 are in accordance with national policy and the objective of contributing to the achievement of sustainable development and are therefore justified and effective.

MIQ 1.3 Is the overall strategic approach, in terms of the vision, outcomes and principles relating to development, its management and delivering the Plan's development requirements positively prepared, justified, effective and consistent with the Framework?

- 2.7 As previously highlighted, we support the overall Vision subject to amendments highlighted in our response to MIQ 1.1. In terms of the delivery of the Vision we continue to have concerns that the Plan will not effectively meet the development principles of Policy DP1 as the housing targets set out within Policy SS1 are not appropriately justified and should be increased to seek to meet the housing and economic growth in the area. We expand upon this within our Matter 2 Hearing Statement.

MIQ 1.4 Has the Plan been informed by an adequate process of Sustainability Appraisal and Habitats Regulations Assessment in this regard?

- 2.8 The Council has published a new Sustainability Appraisal at each stage of the plan making process which provides justification for the strategy proposed. This includes the publication of various latest addendums which relate and respond to proposed post submission modifications of the Local Plan as consulted upon in June/July 2019 and June/July 2021 and provide an update to the existing appraisal of policies and sites as a result of the new evidence.
- 2.9 The Council has followed guidance set out within Planning Practice Guidance (PPG) regarding the need for a Sustainability Appraisal in relation to plan development.
- 2.10 The evidence base for the plan has however been continually retrofitted and our concern is that the Sustainability Appraisal has also been continually retrofitted to align with the Plan as it has evolved and been modified over a significant length of time. This has resulted in a Plan which is not robust or justified.

