

# York Local Plan (YLP) – EiP Hearing Statement

---

**Our ref** 50730/03/MHE/AWi  
**Date** 4 March 2022  
**To** Carole Crookes (York Local Plan Programme Officer)  
**From** Lichfields (on behalf of Bellway Homes)

## **Subject Matter 1: Strategic Vision, Outcomes and Development Principles**

---

### **1.0 Introduction**

- 1.1 This Statement is submitted by Bellway Homes in respect of the Matters, Issues and Questions set out under Matter 1 of the Inspectors’ Phase 2 hearing sessions in respect of the City of York Local Plan.
- 1.2 Bellway Homes have also submitted separate hearing statements in respect of Matters 2 and 5 as part of a consortium with Taylor Wimpey and Persimmon Homes. Statements are also submitted on Matters 4 and 7, specific to Bellway Homes. Each of the submitted statements are to be read alongside each other and relevant representations made during the Local Plan consultation stages.
- 1.3 As a matter of principle, it is Bellway Homes’ opinion that the City of York Local Plan now contains such significant compromises in its approach and the age of critical elements of its evidence base, that it should not be found sound. The Plan was submitted in May 2018 (almost four years ago), following which significant further work was required before the first hearing sessions opened in November 2019 (18 months later). The Inspectors rightly found significant failings with the submitted Plan in June 2020. Rather than revising and updating its approach, the Council has largely sought to retrofit its evidence to address the concerns raised by the Inspectors in respect of the approach to Green Belt. The Phase 2 hearing sessions will open another 21 months after the Inspectors’ identified their concerns. Even with a seemingly ambitious target of plan adoption in 2022, the Local Plan would already be over 5 years into the stated plan period upon adoption.
- 1.4 Since the Plan was submitted for examination, there have been three significant updates to National Planning Policy contained within the NPPF, each having consequences on how this Local Plan is likely to be viewed if it is found sound and adopted. Quite simply, even if the emerging Plan is considered to meet the relevant tests against the 2012 NPPF, its evidence base is likely to be so far out of date on adoption, it will render the Plan out-of-date immediately.
- 1.5 Set out below are Bellway’s responses to the Matter 1 questions.

### **2.0 Strategic Vision, Outcomes and Development Principles**

***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 The Strategic Vision, Outcomes and Development Principles are laudable and broadly supported in principle. Their aspirations provide a sounds basis for the policies contained with sections 2

and 3 of the Plan. The Vision itself would be improved with explicit reference to the delivering the housing needs of the City over the plan period, rather than relying on the text within the supporting text.

2.2 However, whilst the principles of the Vision are appropriate, there is a major internal conflict that the objectively assessed housing need figure which the Vision relies upon is woefully short of what will be required to deliver the wider aspirations of the Vision (refer to our Matter 2 and 5 statements).

2.3 Without the housing needs figures being based on robust and up-to-date evidence it is fundamentally impossible for the Plan to successfully deliver the wider Vision, Objectives and Development Principles.

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

2.4 As with the response to 1.1 (above), the development principles establish a sound basis for development over the plan period. However, they are based on an objectively assessed housing need which is not aligned with the aspirations set out within the principles. For example, the development principle of “addressing the housing and community needs of York’s current and future population” (Policy DP2) is entirely appropriate and supported. However, the supporting text which underpins this principle assumes delivery of an inadequate housing supply. Failing to provide sufficient housing to deliver this principle will have further knock-on effects meaning the Vision and Outcomes cannot be realised by the end of the plan period.

***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?***

2.5 For the reasons set out above and with reference to our Matter 2 and 5 hearing statements, the strategic approach does not represent the ‘most appropriate’ strategy in accordance with the requirements of the NPPF (paragraph 182). Consequently, the approach cannot be considered positively prepared, justified, effective or consistent with NPPF.

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

2.6 The Plan is accompanied by a Sustainability Appraisal of the Composite Proposed Modifications 2021 (EX/CYC/62). It is essential that the modifications and updates to the evidence are supported by an appropriate Sustainability Appraisal and the publication of this is supported.

2.7 However, for the SA to present a robust assessment of the plan and the reasonable alternatives, it is essential that the alternatives which have been dismissed at earlier stages of plan (potential sites and policies) are reassessed in light of the updated evidence. Without such reassessment of earlier decisions, it is not possible to conclude the strategy presented in the plan is the ‘most appropriate strategy’ for development in York over the plan period.