

YORK LOCAL PLAN

EXAMINATION INTO THE SOUNDNESS OF THE CITY OF YORK LOCAL PLAN

Response to Inspector’s Matters, Issues and Questions

Made on Behalf of Barratt and David Wilson Homes

Matter 1 – Strategic Vision, Outcomes and Development Principles

Introduction

These responses are made on behalf of Barratt and David Wilson Homes (Yorkshire East), hereafter referred to as our Client. Our Client is the country’s largest housebuilder and has an excellent delivery record nationally and locally in the region.

Our Client has a significant number of land holdings within and around York and has made representations throughout the CYCLP consultation process at all stages. In summary and for clarity the following is a list of our Client’s interests.

Site Address	Site Reference	CYCLP Area	CYCLP 2013 Capacity (BDWH control)	CYCLP 2016 Capacity (BDWH control)
Manor Heath, Copmanthorpe	ST12	1	250	0
Moor Lane, Copmanthorpe	H29	1	65	88
Riverside Gardens, Elvington	SF10	2	0	0
Eastfield Lane, Dunnington	H31	3	75	84
Metcalfe Lane, Osbaldwick	ST7	4	750	35
New Lane, Huntington	ST11	4	360	0
North of Monks Cross	ST8	6	35	35
North of Haxby	ST9	6	375	375
North of Clifton Moor	ST14	6	750	500

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?

- 1.1 There is a clear vision and framework for the plan, which is outlined across these policies, however this strategic overview has to be implemented. The focus of the plan has to be to deliver these aims, rather than just state them in the introductory policies and then fail to deliver.
- 1.2 Housing is an obvious example of this with Policy DP2 seeking to address the housing needs of the city's current and future population. The future needs of the population can be seen in the government's standard methodology, however due to the submission date of the Local plan, this is not being considered. The Councils approach to housing is shown in the trajectory to be unrealistic, undeliverable and insufficient to meet the needs of the city.
- 1.3 Whilst we do not object to the content of these policies, we do not consider that the plan as a whole delivers them.

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

- 1.4 We do not wish to comment on this question.

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?

- 1.5 The overall strategic approach seeks to deliver York's needs in a positive manner and are broadly in accordance with national guidance and the tests of soundness. The vision, is however a very broad statement setting out what the Council want to achieve, whilst this aspiration is not considered sound if the remainder of the plan, the draft policies and the allocations do not support this then the soundness of the vision is almost irrelevant.

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

- 1.6 Our client raised concerns over the SA previously, which remain in terms of the approach to strategic sites, boundary assessments and site capacities.
- 1.7 Whilst some of these matters were considered in previous examination sessions, we note that the modifications to the SA do not seek to address some of these concerns and in light of further work carried out by the Council, particularly the affordable housing note and the trajectory we have concerns over the SA and its lack of updating in these regards.
- 1.8 The updated trajectory shows a reduction in homes during the plan period and a together with the affordable housing work note shows an undersupply of affordable homes. Notwithstanding this, the SA assesses an alternative trajectory to that submitted to the examination. The SA includes a generic housing trajectory that shows over 1000 homes

being delivered per annum over the plan period. However, the Councils updated detailed trajectory shows that after 2027 this level of housing delivery is only exceeded once, which is the final year of the plan, where it is increased by only by 11 homes.

- 1.9 The SA considers the alternatives of delivering more homes and bases its results on a trajectory that is no longer up to date. The updated trajectory would clearly score worse in the SA given the negative impact on meeting housing need, affordable need, a reduction in local services and other related matters. If assessed against the detailed trajectory, the SA would show a worse position and would not support the changes made, all pointing to the need to deliver more homes in the plan period, either by increasing the capacity on existing allocations or allocating more sites.