

BANKS PROPERTY LIMITED

**EXAMINATION OF THE CITY OF YORK LOCAL PLAN
BANKS PROPERTY RESPONSES TO MATTERS, ISSUES AND
QUESTIONS FOR THE EXAMINATION**

**MATTER 1: STRATEGIC VISION, OUTCOMES AND DEVELOPMENT
PRINCIPLES**

FILE NOTE

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?

The Council's Vision makes no reference to providing places to live, this should be at the forefront of the vision as housing is essential to support the '*city's economic, environmental and social objectives*'; the omitted reference to housing is exacerbated by the context of chronic under-delivery.

The wording: 'by the end of the plan period sufficient site will have been identified for viable and deliverable housing sites ... to meet the housing needs' is not appropriate nor sufficient accurate. The Local authority should be identifying sites now to meet current and future housing need rather than retrofitting sites into the Local Plan allocations.

Paragraph 2.5 identifies a need for 867 dpa. This is inconsistent with other figures quoted in the plan.

DP2i fails to mention the role that housing will play in supporting the prosperity and vitality of the City (NPPF 86 f). A bullet should be added to acknowledge that local housing growth is essential to support the growth of the City.

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

Policy DP1 is ineffective. Although it correctly identifies York as the regional hub, there is no reference to provide housing adjacent to York Sub Area, which is inherently the most sustainable location for residential growth in the LPA boundary. If not in DP1, then this should be captured in a different policy in order to ensure that sites abutting the York Sub Area are considered as the most sustainable after those within the Sub Area.

Policy DP2i fails to take the opportunity to recognise the role that housing will play in supporting the economic growth to enable York to become a 'prosperous city'. DP2ii affords insufficient significance to housing growth; this policy should include wording to reflect the need to provide housing in York through more flexible means such as safeguarded land or white land.

Policy DP3 should include wording support the development of sites in locations that benefit from existing service provision and which are therefore more inherently sustainable.

The presumption in favour of sustainable development (DP4) is supported however the first paragraph of this policy is broadly a replication of NPPF wording therefore its effectiveness as part of the Local plan is questionable.

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?

The vision, outcomes and principles of development within the Local Plan fail to attach sufficient significance to the need to provide housing in the most sustainable locations in York, namely sites abutting the boundary of York Sub Area. Policy wording should be amended to reflect the need for housing in the most sustainable locations.

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

J Perkins/SJC
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