

Matter 1 – Strategic Vision, Outcomes and Development Principles

Made on behalf of York Housing Association, Karbon Homes Ltd, & Karbon Developments

Question 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 We don't take any issue generally with the policies referred in this question as they seem to be largely appropriate in terms of planned development, sustainable development and sustainable communities.
- 1.2 We do however comment on the text that supports the policies. For example, Policy DP1 refers to ensuring the housing needs of the city's current and future populations, including that arising from economic and institutional growth is met. As we will go onto later, we question whether the Plan will provide sufficient land for the housing needs of the city's current and future population.
- 1.3 Similar, we take issue with how Policy DP2 elaborates on the development principle of 'Good Quality Homes and Opportunities', not in the sense that we disagree with the principle but rather with regard to our view that this principle is not adequately backed up with sufficient housing allocations to meet the communities needs of the city's current and future populations.
- 1.4 Further, the text refers to an annual provision of 650 new jobs for current and future residents. We are far from convinced that sufficient land has been provided for economic growth of this level or that sufficient land for new housing has been provided to accommodate this growth in a sustainable manner.
- 1.5 We are also concerned that whilst the Plan references the primary function of the York Green Belt it does not appear to mention, at any point, the need to define a permanent Green Belt that will endure. Indeed, little mention is given to the Green Plan in section 2 of the Plan.
- 1.6 The purpose of outlining our concerns at this stage is to enable the Council to produce a sound plan. Our concerns will be outlined in more detail in our responses to Matters 2, 4, 5 and 7.

Question 1.2

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

- 1.7 Policy DP2: 'Sustainable Development' outlines the following Development Principles:

- Creating a Prosperous City for All
 - Providing Good Quality Homes and Opportunities
 - Conserving and Enhancing the Environment
 - Ensuring Efficient and Affordable Transport Links
- 1.8 We are of the view that these principles chime, in general, with national policy and are largely justified and will be effective. However, what we do question is how effective they will be without the provision of sufficient homes for all.
- 1.9 Our responses to Matters 2, 4, 5 and 7 will elaborate on this much further, nonetheless, we would like to outline here that we have serious concerns as to whether or not sufficient housing land is being put forward for development in the Plan, particularly for those residents wishing to move properties but who wish to continue to live in their existing communities and for the most vulnerable members of the community who need affordable housing.
- 1.10 We are further unsure that the Plan will deliver a fundamental shift in travel patterns, which is what it seeks to do, given that some of the sites will be very reliant on private means of travel. In this regard we would question whether some sites can be made sustainable by offering a genuine choice of transport modes mainly by virtue of their relatively isolated location and limited size.
- 1.11 So that the Council can produce a sound Plan we will describe in our response to the other matters the areas where we question whether the Plan is in accordance with national policy.

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?

- 1.12 We have no comments to the vision and outcomes statement of the Plan. Indeed, we consider that this is succinct and to the point. However, as we will go onto later, we have concerns that the Plan will not deliver the desired outcomes of providing for the existing and future housing needs of the city, particularly in respect of affordable housing and the provision of a permanent Green Belt. As we are of the view that the Plan will not provide either, the Plan, at this stage, is considered not to have been positively prepared, is not justified, will not be effective and is not consistent with national policy.

Question 1.4

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

- 1.13 We have no comment regarding the Habitats Regulation Assessment, and we accept that a Sustainability Appraisal has been undertaken by the Council and in this regard the Plan has been informed by both documents. However, given how much the Plan has changed since the version published in 2013, we question that suitable regard has been held to that process. Clearly all of

the sites that are now allocated and those sites that are reasonable alternatives, especially the previous draft allocations, must be regarded as sustainable sites.

- 1.14 In this context, it is far from transparent that the Sustainability Appraisal process has been properly applied as some of the deleted allocations score the same or better than the allocations now proposed. It is also unclear as to whether the allocations which have been significantly reduced in size have been reassessed as part of any revision to the Sustainability Appraisal.

Conclusion

- 1.15 Overall, this Matter relates to a number of the issues which we will cover in much more detail in our other responses. However, to summarise, we feel there are certain parts of the Plan which could be modified, which would help make it more effective, justified, positively planned and ultimately consistent with national policy.

Modification

- 1.16 To make the Plan sound we feel that additional land for housing development, particularly small and medium sites and land in sustainable locations should be identified. This would help the Council meet what we believe to be the true housing requirement in York, whilst affording the Council greater flexibility in delivering both market and affordable housing in areas which are sustainable and accessible and to meet the city's housing needs in the short, medium and longer terms. This would also ensure that the Green Belt boundaries, when defined, would endure throughout the plan period.