

PHASE 3
MATTER 4



JohnsonMowat
Planning & Development Consultants

Examination of the City of York Local Plan
Matters, Issues and Questions for the Examination

Phase 3 Hearings

Matter 4 – Strategic Sites

July 2022

CLIENT: Taylor Wimpey



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1.0 INTRODUCTION

- 1.1 This response has been prepared on behalf of Taylor Wimpey in relation to their land interests at Strategic Site ST7, east of Metcalfe Lane, York which is a proposed allocation in the Publication Draft Local Plan.
- 1.2 There are three parties with interests in proposed allocation ST7, who have in the past submitted individual and joint representations to the Local Plan as well as attended the Phase 1 Hearings. The recent submissions to the June 2021 Updated Evidence consultation were presented as a consortium response with the following three companies represented.
- **Barratt David Wilson Homes (Barton Willmore)**
 - **Taylor Wimpey (Johnson Mowat)**
 - **TW Fields (PB Planning)**
- 1.3 This response included a critique of the housing requirement undertaken by Lichfields, as well as input from SLR and Pegasus in relation to landscape and heritage considerations of the updated evidence.
- 1.4 Whilst the ST7 developers support the principle of the ST7 allocation disagreement remains with the size of the proposed ST7 allocation as currently drafted. The primary objections remain as follows:
- The site access roads are too long and no doubt costly. Extending the limit of development in the allocation to reduce the access roads would improve deliverability.
 - The developers do not accept the land between the allocation and the edge of the main urban area needs to be Green Belt and collectively request the Council entertain a slightly expanded ST7 (expanded westwards) to marginally reduce the gap whilst maintaining a degree of separation.
 - Whilst the developers are prepared to support the Garden Village concept in its current shape and form, however the dwellings likely to be delivered are unlikely to be able to sustain the community facilities sought by the Council which then may undermine the principal of the Garden Village. In short, the allocation needs to be slightly larger.



- 1.5 Alternative development options have been presented to the Council for a new Garden Village of either 845 homes, 975 homes or 1,225 homes. The final detail of the ST7 allocation will be determined at the Phase 3 Local Plan Examination Hearings.

- 1.6 The content of previous submissions remains relevant, including the Publication Draft submissions in February 2018, July 2019 Proposed Modifications, Phase 1 Hearings and Phase 2 Hearing Statements and the June 2021 Modifications and Evidence Base Consultation. In addition to this statement relating to Examination Matter 4, it should be noted that statements have been prepared for Matter 1 and 10 on behalf of Taylor Wimpey, and Johnson Mowat will be representing Taylor Wimpey at the Phase 3 Examination Hearing sessions relating to Matters 1, 4 and 10.

- 1.7 A Statement of Common Ground specific to Policy SS9 (Site ST7) has been drafted and it is anticipated that by the time the Phase 3 Hearings commence the Statement of Common Ground will be signed by all parties.



2.0 RESPONSE TO INSPECTOR'S QUESTIONS

Matter 4 Strategic Sites

Q 4.7 Is the allocation and associated Policy SS9 relating to ST7 soundly based?

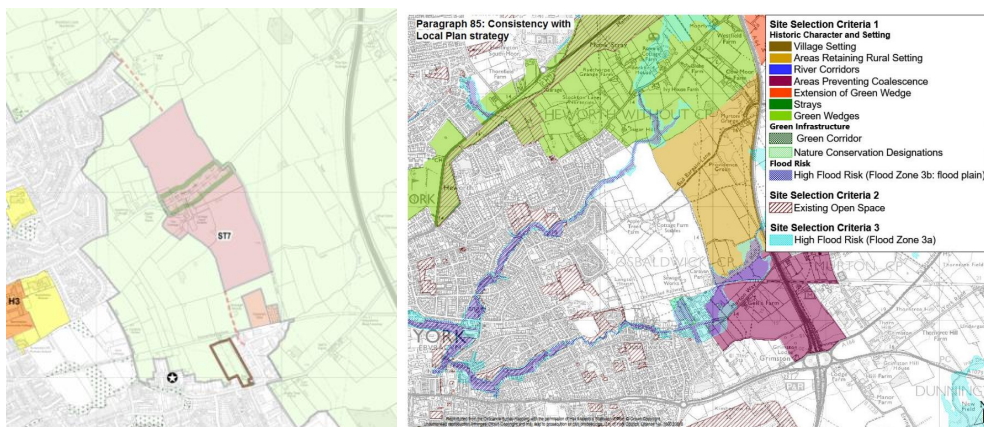
- 2.1 The Plans proposed allocation of ST7 is soundly based having regard to the three strands of sustainability.
- 2.2 The site has been identified in various iterations of the Plan since 2013. The 2018 draft Plan identified the site for 1,800 dwellings. It is our view that proposal was sustainable.
- 2.3 The Council's revision to 845 dwellings in the 2016 Draft Local Plan was less welcomed by the developers. The developers voiced their concern over deliverability of the 845 dwelling allocation and have, in more recent years, made a case for a slightly larger and more deliverable proposal that would be ultimately more self sustaining. The case has been presented for two slightly largely alternatives.
- 975 dwellings
 - 1,225 dwellings
- 2.4 Both of these options are attached to this proposal and have been previously included in the representations of Paul Butler on behalf of TW fields.
- 2.5 For the avoidance of doubt, the ST7 developers can confirm the 845 dwelling allocation is viable and deliverable. The developer team have instructed and undertaken technical work on various strands of the three options referenced above. To date, no technical constraints had been identified as a barrier to the delivery of any of the three options.
- 2.6 The developer team have liaised closely with the Council on the Phase 3 SoCG to agree slight amendments to the Policy SS9 and to additionally confirm the delivery trajectory for this site.

Q 4.8 Are the Green Belt boundaries of the ST7 site reasonably derived?

- 2.7 Whilst Taylor Wimpey support the allocation of ST7 overall, it does not consider the boundaries of ST7 are reasonably derived. Taylor Wimpey appreciate the Council's desire to divorce ST7 from the existing settlement of Osbaldwick to create a 'Garden Village' with its own identity.

However, the Garden Village approach to design does not rely upon a degree of separation from other settlements. Indeed, CYC have sought ST8 to be delivered within the design principles of a Garden Village. ST8 is not as remote from the urban edge.

- 2.8 It is Taylor Wimpey's view that ST7 does not need to be so remote from Osbalwick and being closer would be more sustainable in that both Osbalwick and ST7 residents could take advantage of the social infrastructure that both have to offer – this mutual relationship works better if the distance between the two is less and more convenient to walk.
- 2.9 For ease of reference, we have extracted the Council's 'Local Plan' Map below. It is sat alongside the Consistency of Strategy Plan (repeated at Appendix 2).



- 2.10 The Council's assessment does not provide any justification for retaining land between the suburban edge and ST7 within the Green Belt.
- 2.11 We have presented an alternative approach to defining land in between the suburban edge and ST7 in the Green Belt is proposed by SLR. It is considered that a more appropriate and sensible alternative approach would be to designate the land as **a Strategic or Local Gap** to ensure that a sense of separation between the edge of York and the proposed freestanding settlement ST7 remains.
- 2.12 A Strategic or Local Gap policy does not preclude development but would enable the extent of proposed development within the proposed freestanding settlement ST7 to be tested against established criteria to ensure that a physical and perceptual sense of separation between areas of settlement remains.
- 2.13 We have reviewed the openness of land between the suburban edge and the proposed freestanding settlement (ST7). The TP1 Addendum update only assesses boundaries.



- 2.14 Our assessment concluded that there is inadequate justification for the inclusion of the area of land west of Site ST7 within the Green Belt. The Council's justification for the boundaries is weak. It has not taken into account the context of the area which would be a thin wedge of land between two areas of modern development, thus not preserving the understanding of the compact, historic city within a rural hinterland. The area would be surrounded by development on all sides. The Council's own evidence has not shown that this area serves the purpose of Green Belt purpose 4 and it is considered that this area does not demonstrate the essential characteristics of Green Belt. This is evident in the Council's own Strategy Consistency Plan.
- 2.15 Whilst the ST7 Developer Consortium remain supportive of the identification of Osbaldwick ST7 site as a new Garden Village within the emerging City of York Local Plan, they remain concerned with the size of the current site allocation boundary.
- 2.16 The developer group have reservations the site ST7 could in fact deliver 845 dwellings within the principles of a lower design Garden Village approach. This point is expanded upon by Paul Butler in his case on density.
- 2.17 The consortium remain of the view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS9 of the Local Plan. Particularly in relation to design and density; increased areas of public recreation and open space; internal and external areas of landscaping; and the viable delivery of the required infrastructure through ensuring that the critical mass for the site is achieved.
- 2.18 The net developable residential area of each of the proposed options (see Appendix 1) are similar in size to the current allocation site area identified within the Local Plan. The westward expansion of the site required to deliver each of the proposed options would not require a significant amount of further land when considered against the wider extent of the proposed boundaries of the York Green Belt.
- 2.19 The previously proposed option to deliver 975 homes within a site area of 44ha was endorsed by the Council's Officers in their report to the Council's Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows: -

*"This reflects developers/landowners concerns raised regarding the viability/deliverability of the site, the related ability to deliver the planning principles including provision of educational and community facilities and concerns over the provision of site access to the south of the site. **Officers consider that this boundary amendment could improve the viability of the site and ensure that the planning principles can be delivered.**"*



- 2.20 This 975 Option was also put forward by the Council's Officers as a potential change to the Local Plan ahead of consultation in respect of the Publication Draft Local Plan at CYC's Local Plan Working Group on the 23rd January 2018.
- 2.21 Whilst the logical **recommendations of Officers** were not approved by Members on either occasion, there remains a strong case for the expansion of the site to deliver each of the aspirations of Policy SS9 of the Local Plan and to ensure that the development is viable and achieves the necessary critical mass.
- 2.22 The developers appointed SLR to assess the Council's TP1 Green Belt Addendum documentation in specific relation to landscape. SLR concluded the Council's methodology does not define parcels of land and is therefore unable to quantify how much land extending from the suburban edge should be kept open. Whilst this was debated in the Phase 2 EiP session, the Council's assessment does not provide any justification for retaining land between the suburban edge and ST7 within the Green Belt – this is a matter for more detailed debate in the Phase 3 session.
- 2.23 TP1 currently only assesses boundaries. It is suggested that a more appropriate and sensible alternative approach would be to expand ST7 westwards (1,225 or 975 dwellings options) and designate the remaining land west of ST7 as a Strategic or Local Gap. A Strategic or Local Gap policy does not preclude development but would enable the extent of proposed development within the proposed freestanding settlement ST7 to be tested against established criteria to ensure that a physical and perceptual sense of separation between areas of settlement remains.
- 2.24 In relation to heritage considerations, it is concluded that there is inadequate justification for the inclusion of the area of land west of ST7 within the Green Belt. The land does not demonstrate essential characteristics of Green Belt and it is noted that there are existing planning policy controls that would ensure the green wedge (albeit reduced) would largely remain free from development, further rendering the inclusion in Green Belt as redundant and contrary to policy. In short, it does not need to be Green Belt to be respectful and protective of heritage concerns.

Summary

- 2.25 An increase in the size of the ST7 allocation is justified and would ensure the delivery of the Local Plan's site-specific policy parameters for the site, alongside the proportionate uplift in socio-economic benefits to the City. This would of course include an uplift in the delivery of much needed affordable housing see our Phase 3 Matter 1 response.

App 1 Masterplan Options

Option 1



Option 2



Option 3

Proposed Development at ST7 - Land East of Metcalfe Lane, York



Indicative Master Plan - 1225 Homes

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App 2 Site Selection Criteria 1 – (Extract from ex-cyc-59d page 181)

