

## HEARING STATEMENT

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# CITY OF YORK LOCAL PLAN EXAMINATION

## MATTER 7 – LAND WEST OF ELVINGTON LANE

L & Q Estates

July

**Carter Jonas**

**Date: July 2022**

**Client: L & Q Estates (Formally Gallagher Estates)**

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## 1.0 INTRODUCTION

- 1.1 Carter Jonas LLP (CJ) welcomes the opportunity to participate in the City of York Local Plan Examination in Public (the EiP) on behalf of L&Q Estates (formerly Gallagher Estates) (L&QE). This Statement responds to selected questions set out within Matter 4: Strategic Sites of the Inspector's Matters, Issues and Questions.
- 1.2 The Inspector's Issues and Questions are included in bold for ease of reference. Where a specific question is not covered L&QE has no further comment to make as part of this Hearing Statement however re reserve the right to comment further at a later date.
- 1.3 This Hearing Statement is pursuant to, and cross-references with: previous representations by Carter Jonas in respect of the Pre-Publication Draft (Regulation 18); Main Modifications (Regulation 19) consultations in July 2019; Phase 1 Hearing Statements (December 2019); and, City of York Local Plan Proposed Modifications and Evidence Base Consultation (Regulation 19) in July 2021.
- 1.4 L&QE has a controlling interest in the land at North Field, York, which Carter Jonas continues to promote for release from the General Extent of Green Belt and as an allocation for housing, with the proposed inner green belt boundary being drawn along the A1237 York Outer Ring Road. The land is Site Reference 871 (please see Figure 1 below) within the Strategic Housing Land Availability Assessment (SHLAA) (2018).



Figure 1: Site Location

1.5 We continue to have grave concerns over the soundness of the plan in its current form and the proposed main modifications, which will impact upon the examination timetable and prolong the continued failure to adopt the policy and proposals required to meet the development needs of the City of York in full. Our specific concerns relate to the following matters to be considered under the Phase 3 Hearings and associated Matters, Issues and Questions (MIQS).

- Matter 1: Affordable Housing
- Matter 4: Strategic Sites
- Matter 7: Land West of Elvington Lane

## 2.0 MATTER 7 – LAND WEST OF ELVINGTON LANE

### **MIQ: 7.1 Is the allocation and associated Policy SS13 relating to ST15 soundly based?**

- 2.1 Our concerns relate to the selection and justification of this site and the comments raised in our previous representations still stand which are set out within our representations to the Proposed Modifications (Regulation 19) consultation in July 2019 along with the accompanying CSA Environmental Addendum to Landscape Overview Report dated 22 July 2019. These were highlighted and resubmitted to the Proposed Modifications and Evidence Base Consultation (Regulation 19) in July 2021.

### **MIQ: 7.4 Is the allocation viable and deliverable given the infrastructure requirements, in particular?**

- 2.2 As highlighted within previous representations and by other participants we have concerns that ST15 is not viable, and deliverable given the significant infrastructure requirements associated with the site which has reduced in terms of scale as the Local Plan has progressed. This is coupled with the fact that the costs set out within the Gantt Chart [EX/CYC/70] are indicative. We also note that EX-CYC-79 Phase 2 Infrastructure Note May 2022 highlights that a further update to this infrastructure evidence will be prepared in readiness for Phase 3 hearing. We have yet to have sight of this information.
- 2.3 We note that there are still ongoing discussions with National Highways to identify the mitigation required on the Strategic Road Network. We are concerned that due to mitigation not being agreed the cost associated with mitigation has not been given adequate consideration as part of the viability of the site.
- 2.4 The Council's assessments published on 27 June in relation to the Housing Supply Update 16 May 2022 [EX/CYC/76] includes 7 parts to Appendix 4. Appendix 4 Part 5 relates to Allocations No Consent – Strategic Sites [EX/CYC/76f] however there is no assessment in relation to ST15 Land West of Elvington Lane.
- 2.5 We also note that the Matter 6 Hearing Statement submitted by Langwith Development Partnership (LDP1 ) is the principal landholder of the land proposed to be allocated under Policy ST15 highlights issues with the Council's evidence in relation to the timing, costs and justification for the infrastructure requirements.

