

From: Mark Johnson [REDACTED]
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Attachments: York Main Mods KCS response 21.3.23.docx

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Dear Local Plan Team

Please find attached our response on behalf of KCS. Please confirm receipt.

Regards

Mark

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Main mods response



JohnsonMowat
Planning & Development Consultants

Examination of the City of York Local Plan

Phase 5 Main Modification Consultation

March 2023

CLIENT: KCS Development Ltd



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2.0 RESPONSE TO MAIN MODS



1.0 INTRODUCTION

- 1.1 This response has been prepared on behalf of KCS Development Limited in relation to their land interests immediately west of Chapelfields on the western edge of York City.
- 1.2 Previous submissions have been made to the various draft Local Plan iterations Phase 1 and Phase 2 Examination Hearing Statements, and a detailed response to the June 2021 Modifications and Evidence Base Consultation, and also the Phase 4 Matter 1 statement.
- 1.3 It is maintained that the site at Chapelfields is available for development of circa 90 dwellings and would create a small sustainable urban extension to the existing settlement of Chapelfields, part of metropolitan York.



2.0 RESPONSE TO MAIN MODS

MM2.1: Housing Target

2.1 Comment:

To reduce the annual housing requirement from 867 dwellings to 822 dwellings is short-sighted and fails to reflect the growing need for affordable housing in York which impacts on its economic ability to grow.

The Council need 9,396 affordable dwellings up to 2033 but expect this modified Plan to now deliver only 3,265 dwellings up to 2033. This affordable housing shortfall is significant and could be resolved by allocating additional housing sites. This Plan is clearly failing a key housing objective.

MM3.1: POLICY SS1

2.2 Comment:

In amending and updating the text on the Plan Period 2017/2033 with only limited land allocations from 2033 to 2038 the Plan fails to recognise the need for a Review well before 2033.

The bulk of delivery in this Plan relates only to the period 2033 which is no more than 10 years. The extended Green Belt period from 2033 to 2038 contains very few development sites. From the Council's updated trajectory, it is clear a Review of this adopted Plan will need to commence within 5 years of adoption. This modified text fails to recognise the fragility of the Plan in its latter phases. The revised Trajectory at MM5.4 does not extend beyond 2033.

We request MM3.1 be additionally modified to make reference to a Plan Review commencing no later than 2025.