

**From:** Iain Smith [REDACTED]  
**Sent:** 21 March 2023 08:55  
**To:** localplan@york.gov.uk  
**Cc:** Iain Smith  
**Subject:** RE: Consultation on the York Local Plan Proposed Main Modifications – Representations by the Watkin Jones Group  
**Attachments:** York Local Plan (Modifications) - comments by the Watkin Jones Group.pdf; CYC Local Plan Mods Consultation 23 - PDF Form (2).pdf

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Hi Alison

Thank you for the email.

It is not possible for me to amend the form, check boxes and input details. I have therefore responded to the points asked within the form below:

1. I have read and understand the privacy notice.
2. Name and contact details provided within attached submission.
3. Ditto
4. Yes
5. Proposed main modifications and new evidence documents
6. Section 5 'housing'
7. N/A
8. N/A
9. N/A
10. MM5.17 (and MM 5.18 to some extent)
11. N/A
12. N/A
13. N/A
14. N/A
15. N/A
16. N/A
17. N/A
18. N/A
19. N/A
20. N/A
21. EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
22. Object
23. Not positively prepared, not justified and not effective.
24. Contained within the attached submission.

Kind regards

Iain

**Iain Smith BA (Hons) MTPL MRTPI**

**Planning Director**

T: [REDACTED]

M: [REDACTED]

Kingsfield Court, Chester Business Park, Chester, CH4 9RE



Creating the Future of Living

[www.watkinjones.com](http://www.watkinjones.com)



**From:** [REDACTED]

**Sent:** 20 March 2023 15:16

**To:** Iain Smith [REDACTED]

**Subject:** RE: Consultation on the York Local Plan Proposed Main Modifications – Representations by the Watkin Jones Group

Hi Ian

I can confirm that we have received your response. However, please could I request that you complete the attached survey form and return to us. The survey form mirrors our [online form](#) and asks specific questions in relation to our privacy notice, amongst other things, that we need to receive to appropriately process the response. For clarity, please could you also indicate using this form, or through updating your response previously attached, to reference which modifications/ evidence base you are specifically referring to for the avoidance of doubt.

Regards

Alison

Alison Cooke | Head of Strategic Planning Policy (she/her)

e: [Redacted]

**City of York Council | Strategic Planning Policy**

Directorate of Place|West Offices |Station Rise |York YO1 6GA

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Working Days: Monday, Tuesday and Thursday

**From:** Iain Smith [Redacted]

**Sent:** 17 March 2023 15:15

**To:** [localplan@york.gov.uk](mailto:localplan@york.gov.uk)

**Cc:** Iain Smith [Redacted]

**Subject:** Consultation on the York Local Plan Proposed Main Modifications – Representations by the Watkin Jones Group

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam

Please find attached the comments of the Watkin Jones Group PLC to the York Local Plan Proposed Main Modifications. Please could you confirm receipt of these representations.

We trust that our representations on these aspects of the draft Plan are of assistance to the Council and will be taken into account. In the meantime, please do not hesitate to contact me if you have any queries.

Kind regards

Iain

**Iain Smith BA (Hons) MTPL MRTPI**

**Planning Director**

T: [Redacted]

M: [Redacted]

Kingsfield Court, Chester Business Park, Chester, CH4 9RE

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## 1. Survey Information

Comments made during this consultation should relate to the proposed Main Modifications, Policy Map changes, associated Sustainability Assessment (SA) or Habitat Regulation Assessment (HRA) Addenda and new evidence documents. All representations made will be taken into account by the Inspectors in examining the Plan. Comments should relate to the Plan's legal and procedural compliance and the soundness of the modifications. The tests of soundness are set out in the [National Planning Policy Framework](#).

Please read our [guidance note](#) for more information on taking part.

Our survey asks for some personal information which you may choose not to give. We do not publish or share any information which can identify you. Please read our [privacy notice](#) to find out more about how we protect your personal information. We will ask for your consent to this at the start of the survey.

You can withdraw your consent at any time by contacting [localplan@york.gov.uk](mailto:localplan@york.gov.uk).

\* 1. Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes     No



## 2. Register for consultation

\* 2. Your name:

\* 3. Contact details:

*Please provide email and/or address*

Organisation (optional)

Address

Address 2

City/town

Post code

Email address

\* 4. Do you wish to be notified when the City of York Local Plan is adopted by the Council?

*If yes we will use contact details provided above*

Yes  No

### 3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

\* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

## 4. Proposed Main Modifications

\* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

## 5. Section 2: Vision

\* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management



## 6. Section 3: Spatial Strategy

### \* 8. To which modification does this response relate?

- |  |  |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road    |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs            | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road    |
| <input type="radio"/> MM3.3 Key Diagram  | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road    |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution)  | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road    |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3             | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt          | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61    |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre                       | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.8 Policy SS4: York Central                           | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.9 Policy SS4: York Central                           | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.10 Policy SS4: York Central                          | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway                        | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway                        | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway                        | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph            | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School            | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground           | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane    |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road            | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64    |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane            | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67    |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane            | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites         |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane            | <input type="radio"/> MM3.60 Policy SS15: Nestle South                   |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane            |  |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane            |  |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane            |  |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane            |  |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48           |  |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross            |  |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross            |  |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross            |  |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross            |  |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

## 7. Section 4: Economy and Retail

\* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

## 8. Section 5: Housing

\* 10. To which modification does this response relate?

- |   |   |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations                  | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers                    |
| <input type="radio"/> MM5.2 Policy H1, table 5.1                            | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople                     |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16  | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople                     |
| <input type="radio"/> MM5.4 Policy H1 Explanation                           | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2                                       | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42        |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development   | <input type="radio"/> MM5.17 Policy H7: Student Housing                           |
| <input type="radio"/> MM5.7 Policy H2 explanation                           | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47               |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market         | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing          |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market         | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59               |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing                       |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers              | <input type="radio"/> MM5.22 Policy H10 explanation                               |

## 9. Section 6: Health and Wellbeing

\* 11. To which modification does this response relate?

- |  |  |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20  |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5     | <input type="radio"/> MM6.9 Policy HW4: Childcare provision          |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9     | <input type="radio"/> MM6.10 Policy HW5: Healthcare services         |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10    | <input type="radio"/> MM6.11 Policy HW5: Healthcare services         |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities       | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a                            | <input type="radio"/> MM6.13 Policy HW6: Emergency Services          |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities         | <input type="radio"/> MM6.14 Policy HW7: Healthy Places              |

## 10. Section 7: Education

\* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

## 11. Section 8: Placemaking, Heritage, Design and Culture

\* 13. To which modification does this response relate?

- |   |  |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking                      | <input type="radio"/> MM8.9 Policy D6: Archaeology   |
| <input type="radio"/> MM8.2 Policy D1: Placemaking                      | <input type="radio"/> MM8.10 Policy D6 Explanation   |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting                | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets     |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision               | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37                   |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas               | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens                             |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph                             |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings                 | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs      | <input type="radio"/> MM8.16 Policy D13: Advertisements  |

## 12. Section 9: Green Infrastructure

\* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision



### 13. Section 10: Managing Development in the Green Belt

\* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

## 14. Section 11: Climate Change

\* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

## 15. Section 12: Environmental Quality and Flood Risk

\* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

## 16. Section 14: Transport and Communications

\* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

## 17. Section 15: Delivery and Monitoring

\* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

## 18. Proposed Policy Map Modifications

**Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.**

\* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)



## 19. New evidence documents

### \* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

## 20. Comment Form

22. Do you support or object to the proposed modification(s)?

- Support     Object

**The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182).**

23. If you object, please select your reason from the list below (select all that apply):

- Not positively prepared - i.e. strategy will not meet development needs
- Not justified - i.e. there is no evidence to justify the modification
- Not effective - i.e. it won't work
- Not consistent with national policy - i.e. doesn't comply with the law

24. Please set out the reasoning behind your support or objection:

*Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.*



50 JERMYN STREET, LONDON, SW1Y 6LX  
TELEPHONE: 0203 617 4440

17 March 2023

By Email – [localplan@york.gov.uk](mailto:localplan@york.gov.uk)

Dear Sirs,

## Consultation on the York Local Plan Proposed Main Modifications – Representations by the Watkin Jones Group

Please see below the comments of the Watkin Jones Group PLC (WJG) in relation to the York Local Plan Proposed Main Modifications consultation.

### About Watkin Jones Group

With a focus on delivering for our customers since 1791, WJG is the UK's leading developer and manager of residential for rent homes. By spearheading this emerging sector, WJG is creating the future of living for a diverse and growing group of people who want flexibility, convenience, and a strong sense of community alongside the best location and value. Its purpose-built build to rent (BTR, multifamily), co-living and student homes are designed and built sustainably, and welcome people from all backgrounds to enjoy a great way of life, generating a positive impact for wider communities. Beyond residential for rent, its successful and well-established house building division has an increasing focus on the delivery of affordable and BTR single family homes.

With increasing pressure on many areas to speedily deliver new housing, WJG has an excellent track record of creating homes fast without compromising on quality. Over 95% of our projects are on site within six months of the grant of planning permission and its in-house construction capacity means that it can rapidly boost housing supply. Over the last 25 years WJG has delivered over 54,000 homes and currently has a £2bn pipeline. In York, WJG delivered 368 student homes at Frederick House on Fulford Road last summer.

Today, WJG successfully works across every part of the UK focussing on centrally located, previously developed sites. WJG's end-to-end delivery model means that it acquires, designs, and builds places, and typically remain within communities as on-site building managers. Fresh is our multi award-winning operator arm, who are currently managing approximately 23,000 rental homes at 72 locations across the UK and Ireland. Fresh achieves 95% customer satisfaction, and cares for our residents with a range of wellbeing and community building activities.

### Scope of Representations

WJG welcomes the opportunity to submit comments on the York Local Plan Proposed Main Modifications. Our representations focus on draft Policy H7 'Off Campus Student Accommodation'.

We also highlight that the Council has no policies to guide the delivery of build to rent (BTR) homes and co-living homes in York. WJG considers these are and will be important residential tenures within the city over the plan period. We appreciate that the NPPF has been updated since the Council's Local Plan review process commenced, but we highlight below the requirements of para. 62 of the NPPF to include housing policies related to the needs of different groups:

*"Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, **people who rent their homes** and people wishing to commission or build their own homes)".*



*Building the future*

[www.watkinjones.com](http://www.watkinjones.com)



WATKIN JONES & SON LTD REGISTERED OFFICE : LLANDYGAI INDUSTRIAL ESTATE, BANGOR, GWYNEDD, LL57 4YH • REGISTERED NUMBER : 2539870 (U.K.)

These are addressed in turn, along with our proposed recommendations to ensure that the Plan meets the tests of soundness set out in Paragraph 35 of the National Planning Policy Framework (NPPF) – namely, positively prepared, justified, effective and consistent with national policy.

### **Purpose Built Student Accommodation**

WJG provides its comments on the modifications proposed to Policy H7 ‘Off Campus Purpose Built Student Housing’, specifically in relation to the part of the draft policy upon which proposals for off-campus purpose-built student accommodation (PBSA) will be assessed (i.e. the later parts of the draft policy).

WJG considers that various elements of the draft policy are acceptable. These comprise:

- Demonstration of need (point i).
- Located within an appropriate and accessible location (point ii).
- No detrimental impact on the amenity of nearby residents and the design and access arrangements would have a minimal impact on the local area (point iii).
- The PBSA will be occupied only by full time students enrolled in courses of one academic year or more and the development will be effectively managed (point iv).

WJG objects to two elements of Policy H7 and considers these matters later:

- Rooms within the development are secured through a nomination agreement for occupation by students of one or more of the University of York and York St John University (point iia).
- Financial contribution from PBSA towards affordable housing elsewhere in the city.

Both of these points have been included within the modifications proposed and did not feature within the draft York Local Plan when originally submitted to PINS.

### **The Need to Secure a Nomination Agreement**

#### *Purpose of a Nomination Agreement*

Para. 6 of the Council's ‘Student Housing Policy H7 Note (August 2022)’ suggests that the purpose of off-campus PBSA schemes securing a nomination agreement is:

*“The requirement to secure a nomination agreement (which is found elsewhere e.g. in the London Plan) aims to facilitate the negotiations between the Universities and PBSA providers and to **assist indirectly with affordability issues**, rather than introducing a student affordable housing test which will inevitably be more complex and difficult to administer”.*

#### *Demand for Purpose Built Student Accommodation in York*

It has been widely reported that the demand for student accommodation in York is significant. Recent media coverage, for example within the Guardian on 26 December 2022, have stated:

*“Student housing is reaching a **“crisis point”** not seen since the 1970s, when students slept in sports halls and their cars, and is set to worsen in the new year, a charity has warned...*

*Experts say there are **growing numbers of students** experiencing periods of hidden homelessness or accepting unsuitable housing out of desperation. Students say they have been forced to couch-surf with friends, live with parents some distance away or accept unsuitable rooms such as those without windows...*

*You’re beginning to see **student housing moving into shortage** across the majority of universities – not just the ones you read about,” said Martin Blakey, the chief executive of the student housing charity Unipol...*

*In Glasgow, students have begged their university not to halt recruitment after those left unhoused were told not to register for their courses; students in Durham queued overnight to reserve housing for next year; **students at Bristol were housed in Newport, Manchester students in Liverpool and York students in Hull**; and students in Northern Ireland have set up their first housing cooperative”.*

Both of York's universities have experienced significant growth in their student population over the last decade, as evidenced within papers submitted by universities (University of York and York St John University) in 2022 as part of the Local Plan examination process. Student growth in York has been higher than the average growth of other university towns and cities across the UK. Coupled with this, the city currently has an undersupply of PBSA and it is common ground within those statements that the number of students studying within the city is expected to continue to increase.

This need has also been recognised within the Technical Note prepared by Porter Planning Economics which accompanied the Council's 'Student Housing Policy H7 Note (August 2022)'. This recognised that there was an increased reliance on the private sector to house students (para. 7). The following comment, from Professor Jeffrey from the York St John University, was included within the Technical Note:

*"The university was booming despite Covid, but its future plans could be hindered without room to grow. Along with this growth, the university is experiencing growing demand for managed accommodation among home students and especially international students beyond the traditional first years that they live in the halls of residence provided by the University. This is because of a tightening of the private sector housing supply in the City".*

Coupled with this (and reflected within the comment from Professor Jeffrey), student accommodation trends have also been changing in recent years, with more second and later year students, as well as postgraduates, favouring PBSA over other forms of accommodation (e.g. HMOs).

The modern student values the security, convenience and inclusivity provided by PBSA. Besides rental cost, there are many reasons why students choose to live in PBSA over other forms of accommodation (e.g. HMOs). This can include, amongst other matters:

- The quality of the accommodation. PBSA is developed, operated, and maintained at a higher standard. It also typically has a better standard of broadband/ Wi-Fi, study space and socialising space based on tried and tested designs.
- Utility bills are borne by the landlord in PBSA, meaning that tenants benefit from the savings generated by the efficiencies of scale in a larger building, that is part of a wider portfolio, and benefit from certainty of cost. This allows for students to insulate themselves from the 'cost-of-living crisis'.
- PBSA is typically located in more accessible locations, closer to the city centre or universities (i.e. it is typically closer to the facilities which students require access to). This allows residents to integrate into the wider community as opposed to creating wide swathes of housing occupied by only students.
- Trained management staff offer pastoral support. Those staff will have relationships with the support staff at universities and be able to support the needs of each of its residents, including supporting their mental health.
- Superior amenity and communal facilities offered within PBSA, both internal and external. This is of benefit to residents' health, wellbeing and education experience.
- Events and programmes provided by the operator/ manager of the PBSA.

### *PBSA Economics in York*

Porter Planning Economics Technical Note make some important comments on the economics of PBSA in York. They recognise that residential property values (and thus cost of land) is approaching 40% higher than in York than in similar cities such as Leeds, yet the average rental values for PBSA are similar to those of Leeds.

### *What This Means?*

In order that much needed PBSA can be delivered viably in a city with limited land opportunities, high land costs and constrained rental values, developers have to provide studio apartments within their PBSA development, either for all or part of PBSA developments. These command higher rents and are also very popular, particularly with international and later year students. Indeed all nine consented or operational PBSA schemes on pages 13 and 14 of Porter Planning Economics Technical Note include studio rooms.

It is very rare for universities to enter into a nomination agreement on studio rooms. Universities favour taking a nomination agreement on cluster rooms as: they are favoured by earlier year students (e.g. first year students); universities typically need to provide accommodation for their first years; and their rental cost is lower. It also replicates the type of accommodation which universities provide themselves. Like any form of housing, there are

different types of PBSA catering to the needs of different students. Studios have a place in the market and form part (if not all) of most PBSA developments in the city.

As it is very uncommon to secure nomination agreements on studios, it will severely constrain, if not stop, PBSA being delivered within York on both grounds of viability and the needs of students. This is not the purpose of the policy, which is to understandably adopt a campus first approach to PBSA. Indeed, the Council's Technical Note recognises that there is a need for PBSA and that students contribute significantly to the social vibrancy of the city and the local economy. PBSA needs to be positively promoted through policy. Policy which may hamper its delivery cannot be adopted.

The Technical Note refers to London as a precedent for the approach suggested by the Council. In London, nominations agreements are required on the "majority" of student rooms (i.e. 50% of rooms plus one additional room), not on all rooms within a development as the Council is suggesting. London, with well over 30 different universities operating within a polycentric urban area, has a very different PBSA market to that of York and direct comparison cannot be made between the two. It is important, however, to understand the purpose of requiring nominations agreements in London. It is to demonstrate strategic need for the PBSA. This is detailed at paragraph 4.15.3 of the London Plan which states (WJG emphasis):

*"To demonstrate that there is a **need** for a new PBSA development and ensure that accommodation will be supporting London's higher education providers, the student accommodation must either be operated directly by a higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students".*

There is concern that if the policy remains in its current form, and in order for new PBSA to be viable and deliverable, it's likely that the burden of this policy will be shifted to universities requiring them to pay a combination of higher rents rising with inflation and long-term nomination agreements. This is not the intention, nor does it appear to be what the two universities are seeking to achieve. Rather policy is seeking to deliver more cost effective PBSA and the approach suggested by the Council will have the opposite effect. Importantly, we can find no reference to either of the universities suggesting through the examination process that a nomination agreement should be required on off-campus PBSA development.

It is important to note that a nomination agreement cannot be provided at planning application stage. All that universities can provide at this stage is a statement of intent or a letter of support to confirm that it intends to enter into a nomination agreement on the subject site/ development. This is because universities do not necessarily want to sign up to a nomination agreement before planning permission is granted as there is no certainty of delivery at all or for a particular academic year start date. Universities are more willing to consider such a commercial contract a year or less before the development is completed. It is important that the accompanying text to Policy H7 reflects this.

To make this policy sound, WJG consider that the requirement to enter into a nomination agreement should be removed from Policy H7. It is not justified or based upon reasonable evidence.

If the Council was minded to retain a reference to nomination agreements due to new evidence arising then points (i) and (iia) of the should be combined in order that a nomination agreement can be one option in which to demonstrate need. As such, WJ suggest that point (i) should be reworded as follows:

*"i. it can be demonstrated that there is quantitative need for student accommodation which cannot be met on campus. This demonstration of need can also be satisfied through a nomination agreement for the majority of accommodation for occupation by students of one or more of the University of York and York St. John University secured by planning condition prior to occupation".*

### **Financial Contribution Towards Affordable Housing**

We consider that the requirement for an affordable housing contribution from PBSA is not supported by robust and sound evidence.

Porter Planning Economics Technical Note (August 2022) does not accurately reflect the 'real' cost of PBSA developments. Using the 200-bedroom PBSA appraisal within the appendix of their report as an example (which WJG consider accurately reflects the typical size of a PBSA development in York), WJG note the following inaccuracies:

- Land value – this is stated as £8,800 per PBSA bedroom which is wholly unrealistic. The actual price of land for PBSA in York is much higher. As a guide it is five to six times that value.
- Build costs – this is stated as £187/ sq. m and is far too low. Build costs are currently, and more realistically, 20% higher than this.
- Efficiencies – 26.5 sq. m per student bedroom is too low.

The conclusions of Porter Planning Economics Technical Note are incorrect and misleading. Clearly the insertion of 'real' values as detailed above will result in the conclusions of their report being entirely different (i.e. PBSA cannot viably support the provision of a contribution). This is evidenced further by the point also within Porter Planning Economics report (and detailed earlier) that land values are higher in York than other cities, yet the returns are similar. Those other cities do not have any policy requirements for an affordable housing contribution to be provided from PBSA. Adding a requirement to provide a contribution towards affordable housing from PBSA in York will result in PBSA developments not being viable or deliverable and will severely constrain, if not stop, supply of new PBSA. This does not align with the city's clear need for more PBSA.

To make this element of the policy sound, a requirement for a financial contribution towards affordable housing from PBSA should be removed from the policy.

WJG comments on other elements of this policy suggestion on a without prejudice basis.

The Council is suggesting that an affordable housing contribution from student accommodation is calculated using the following calculation:

$$\text{Average York Property Price} - \text{Average York RP Price} \times \% \text{ Target} = \text{Off-Site Financial Contribution per PBSA student room}$$

WJG considers that the above calculation is an overly complex approach in which to calculate the affordable housing contribution. Moreover, the average property prices (open market and affordable) are also not defined figures and open to interpretation by different parties.

For the reasons presented earlier, and if this element of the policy remains, WJG strongly supports (and considers it essential) that financial contributions towards affordable housing can be subject to viability.

### **Build to Rent**

WJG encourages the Council to assess the need for and viability of BTR in the city and positively plan for it within the Local Plan as required by the NPPF. Specifically, WJG requests that the Council includes a policy which future BTR schemes may be assessed and provides suggestions below as to what should be included within such a policy.

WJG considers that the draft Plan should also give positive encouragement to the development of BTR schemes as these are ideally suited to smaller brownfield sites located within city centres that can be constructed at high densities given the high accessibility and strong amenity context. BTR schemes can also make significant contributions to local housing supply figures as a high number of units can be constructed and delivered within a short space of time.

The draft Plan fails to consider in any detail more modern housing tenures such as build to rent (or indeed co-living). Such tenures are actively promoted in the latest iterations of both the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG). The NPPG within the 'Build to Rent' (BTR) chapter (Paragraph: 001 Reference ID: 60-001-20180913) states

*"As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent. Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidence-based planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups".*

NPPG continues by adding:

*“If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent. This should recognise the circumstances and locations where build to rent developments will be encouraged – for example as part of large sites and/or a town-centre regeneration area”.*

It is not clear from the draft Plan as to whether any assessment has been undertaken by the Council into the potential requirement for BTR homes. WJG consider that the Council has missed an opportunity to include a suitable policy for an established and growing market that can help to add to the Council's supply of housing. WJG considers that the Council should proactively plan for it as part of the Local Plan process.

WJG consider that more clarity is required on affordable housing requirements is provided from BTR developments. Such forms of affordable housing are not currently recognised within the emerging Local Plan. In the first instance, WJG support policies which are clear in that regard will be given to development viability on a site-by-site basis. With regards to the discount required, it is notable that NPPG requires *“a minimum rent discount of 20% for affordable private rent homes relative to local market rents”* (Paragraph: 002 Reference ID: 60-002-20180913). WJG support the replication of the NPPG approach to affordable housing from BTR.

In summary, WJG encourages the Council to objectively assess the need for BTR and plan for this tenure.

### **Co-Living**

Co-living, a form of BTR, is a relatively new concept of housing which aims to provide a housing option for single person households, who cannot or chose not to live in self-contained homes or houses in multiple occupation (HMOs). In planning terms this housing type is sui generis non-self-contained market housing and is not considered conventional residential, which would fall under Use Class C3. This type of housing is not restricted to particular groups by occupation or specific needs.

In addition, communal amenity space is provided in lieu of private floorspace to create a sense of community and encourage social interaction and engagement between its residents. The private units are appropriately sized to be comfortable and functional for tenants needs and generally include en-suite bathrooms and limited cooking facilities (e.g. a kitchenette), but with access to larger kitchen and dining facilities elsewhere in the development. It is important to note that the Nationally Described Space Standards (NDSS) do not apply to this type of accommodation due to its key attribute as a 'cost-effective' alternative form of housing, which would be proven negligible should unit sizes be increased.

WJG is actively pursuing co-living schemes in core cities across the UK, noting that co-living has played an important role in attracting and retaining talent and supporting economic development. In fact, it is of note that some UK cities (e.g. Exeter) have installed a specific and pro-active drive for more co-living developments, recognising that those cities with already established co-living opportunities are at an advantage when seeking to retain and attract graduates seeking quality and cost-effective accommodation. On this basis, WJG has identified York as an ideal location to support, sustain and derive benefit from this residential model.

WJG encourages the Council to include policy upon which the design and affordable housing approach for future co-living schemes may be assessed.

### **Conclusion**

WJG welcomes the opportunity to comment on the proposed main modifications to the York Local Plan. Our comments have focussed on draft Policy H7 which relates to PBSA. We consider this policy is not currently sound and the suggested approach is not supported by robust evidence. We have made suggestions which we consider will make this policy sound.

WJG also highlights that the Council has not proposed policies relating to built to rent and co-living within its draft Local Plan. BTR is being delivered in the city (e.g. Moda's Heworth Green development) and is expected to expand. Whilst a newer form of residential for rent, WJG has identified York as a location which would benefit from co-living. It is expected that the delivery of BTR and co-living in York will increase over the plan period. WJG suggests that the Council includes policies for BTR and co-living within the emerging Local Plan.



We trust that our representations on these aspects of the draft Plan are of assistance and will be taken into account. In the meantime, please do not hesitate to contact Iain Smith on [REDACTED] [REDACTED] or [REDACTED] should you have any queries.

Yours faithfully

[REDACTED]

Iain Smith  
Planning Director

