

CITY OF YORK LOCAL PLAN 2017 - 2033

EXAMINATION IN PUBLIC

**MATTER 2: THE HOUSING STRATEGY: THE OBJECTIVELY ASSESSED NEED FOR HOUSING
AND THE HOUSING REQUIREMENT**

HEARING STATEMENT ON BEHALF OF BANKS PROPERTY

NOVEMBER 2019

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1.0 INTRODUCTION

- 1.1 This statement is submitted by Banks Group Ltd (“Banks”) in relation to the Examination in Public of the York Local Plan (“the plan”). Carter Jonas LLP is instructed by Banks.
- 1.2 Banks is promoting Land at Malton Road, York to for release from the General Extent of Green Belt designation and subsequent allocation for housing through the Plan.
- 1.3 Banks has specific and important concerns that the plan is not sound, and representations were made detailing the views of Banks through the informal (Regulation 18) and publication (Regulation 19) consultations for the local plan (Representor ID: 2690).
- 1.4 This statement should be read in combination with Banks’ responses to the inspector’s others Matters, Issues and Questions.

2.0 INSPECTORS' MATTER 2 – THE HOUSING STRATEGY: THE OBJECTIVELY ASSESSED NEED FOR HOUSING, THE HOUSING REQUIREMENT AND THE SPATIAL DISTRIBUTION OF HOUSING

THE HOUSING MARKET AREA (HMA)

Q. 2.1 We understand that the Council considers York to be within an HMA which includes the City of York and the area of Selby District Council, but that the two Councils are identifying housing need within their administrative areas separately.

a) Is that correct? If so:

2.1 Banks notes that the 2016 SHMA concludes (at paragraph 2.103) that the housing market area for each of the commissioning authorities (York City Council, Ryedale District Council and Hambleton District Council) should be considered separately, but that the HMA for York extends into Selby. However, the latter authority produced its own SHMA.

2.2 It is further noted that the none of the subsequent updates or amendments to the SHMA has attempted to engage with the definition of the housing market area so it is assumed that the commissioning authorities and GL Hearn continue to believe that the HMA are as stated in 2016. Banks considers that this is a reasonable position for the Council to take, but points to the evidence in the SHMA at tables 3, 4 and 5, in particular, which demonstrate that the migration and commuting patterns between authority areas are significant and that housing needs and employment provision considerations extend beyond authority boundaries. The implications of these needs, and the Council's current under provision in its plan to meet them, will not only effect York, but surrounding authority areas as well.

b) Is the identification of the HMA formed on a robust evidential basis?

2.3 The now archived Planning Practice Guidance (PPG) that supported the NPPF 2012 explained that a HMA reflects the functional linkages between where people live and work, and that they are a geographical area, that may overlap, and would not necessarily follow political boundaries. Issues that arise from overlapping HMA and inconsistencies between geography and the political 'landscape' should be considered through the Duty to Cooperate (Reference ID: 2a-010-20140306).

2.4 As stated above, Banks considers that the HMA is reasonably identified, but the functional links with surrounding authority areas must not be overlooked or forgotten. It is assumed, but Banks has seen no unequivocal statement to this effect, that the 'commissioning authorities' of the 2016 SHMA agree that the HMA are reasonable, and that therefore the Council's responsibility through the Duty to Cooperate has been discharged in this regard. However, Banks notes that in the latest addendum to the Council's evidence for the Duty to Cooperate (EX_CYC_23) there appears to be some tension between the authorities and the repeated reference to the City Council meeting its own need, and the inference that there is no capacity for neighbouring authorities to take any unmet need. The statement from Selby, though, focuses on the housing need figure, but makes no reference to land capacity in either authority area. It is assumed that Selby will not be in the position to take any unmet needs from York if they do emerge, but this is not made clear in any statement that Banks has seen.

c) What is the justification for assessing housing needs separately?

- 2.5 Banks accepts the pragmatism of authorities assessing their own needs to support their own plan making timetables. This is an approach of which Banks has experience elsewhere and can be seen in several locations across the country. The outcome of such an approach, however, has mixed results. Banks believes that whilst the approach can be made to work, and avoids delays in evidence creation or indeed duplication of effort, it is critical that authorities' clearly and robustly set out their housing and economic land capacity; understand and accept the interlinkages between the separately assessed needs; and, agree to jointly monitor (and review as necessary) the delivery of development against the needs. It is not clear if York and Selby (and the other 'commissioning authorities' of the SHMA) have agreed to such an approach.
- 2.6 The interlinkages and impacts of the housing needs and employment provision in York has wider implications than the city and Selby. This is identified in the SHMA as can be seen in later migration trends. The separate assessment of needs in York and Selby in and of itself may not have created a problem but, the failure of York Council to robustly identify a credible housing requirement in the Local Plan and to identify sufficient land and sites to meet that need will have implications across the HMA and those which it neighbours.

THE OBJECTIVELY ASSESSED HOUSING NEED

Q. 2.2 Policy SS1 and Paragraph 3.3 of the Plan say that the objectively assessed housing need ('the OAHN') is 867 dwellings per annum (dpa) in the Plan Area for the plan period to (2017 to 2033) (16 years). However, since the submission of the Plan for examination, the Council has put forward further evidence to indicate that the OAHN is now considered to be 790 dpa in the Plan Area for 2017 to 2033.

a) We understand that this calculation initially was derived from the conclusions of Technical Work carried out by GL Hearn in the Strategic Housing Market Assessment Update (2017) [SD050] which updated the demographic baseline for York based on the July 2016 household projections. However, the revised OAHN is now based on further work undertaken by GL Hearn presented within the City of York – Housing Needs Update (January 2019) [EX/CYC/9]. Is this correct? Is this a robust evidential basis?

- 2.7 The archived PPG explained that local needs assessments should be informed by the latest available evidence (Reference ID: 2a-016-20150227) and this goes some way to explaining the approach taken by the Council in identifying and regularly updating the OAHN. Each iteration and amendment to the SHMA findings reflects an update to the mid-year household projection estimates. However, the same PPG goes on to state that changes in the housing situation does not automatically mean that housing assessments are rendered outdated every time new projections are issued.
- 2.8 Banks considers that the OAHN and its evidence base is not robust. The OAHN figure first, needs to be considered in the context of the Government's clear and continued commitment to a target of 300,000 new homes a year across the country. This target was first announced in the Autumn Budget 2017, i.e. before the submission of the Local Plan. This target has been used as a reason for the Government to now require the use of the 2014 mid-year projections for the 'Standard Methodology' in the short term.

Moreover, the changes in the methodological approach between the 2014 and 2016 mid-year projections has led to a national under reporting of some key issues:

- First; the 2016 projections are based on looking back at data from a limited time period (2001 – 2011) meaning that short term ‘fluctuations’ in population could be overstated compared to the base year for the 2014 projections which is 1971.
- Second; in the 10 years upon which the 2016 projections are based, there was a slow down (which continues) in young people ‘forming households.’ Projecting this trend forwards would not engage and seek to solve the challenge of young people being able to find somewhere to live.
- Third; the life expectancy and migration statistics for the 2016 projections both slowed and assumed a smaller population growth that would not necessarily meet the needs of a currently aging population or the economic aspiration of the Government, Local Authorities or Enterprise Partnerships.
- Finally, as is stated in guidance, and has been confirmed by the ONS, projections are not predictions. The mid-year figures are a starting point upon which to build a housing requirement to meet the objectives and aspirations of national and local populations.

2.9 Banks also considers that there are compelling reasons for the Council to use the ‘Standard Methodology’ to identify its housing needs. This would avoid the confusing situation of reviewed and revised housing requirement figures, which will need to be reviewed themselves soon after adoption to avoid the plan becoming quickly out-of-date and that decisions will continue to be made in the context of the NPPF 2019 and supporting housing delivery tests etc. However, it is accepted that the Plan was submitted before 24 January 2019 transition deadline and that the SHMA is the basis for the examination. This being the case, Banks observes that there are serious flaws in the methodology and findings of the SHMA in respect of:

- (a) The economic needs assessments that underpin the housing requirements are dated and in need of review.
- (b) The affordable housing uplift is not reflective of the latest needs identified in the SHMA addendum
- (c) The 15% adjustment that is suggested by GL Hearn conflates the matters of market signals and affordability and does not go far enough to engage with either matter.

b) Does the 13,152 total housing figure identified at the year ‘2032/33’ in the SHLAA Figure 6: Detailed Housing Trajectory Updated (790dpa OAHN) [EX/CYC/16] include meeting housing need arising in parts of adjoining districts (e.g. Hambleton, Harrogate, East Riding, Ryedale and Selby) which fall within the York Housing Market Area, as set out in the City of York Strategic Housing Market Assessment 2016 [SD051]?

2.10 It is not clear that the figure of 13,152 dwellings does include meeting any needs arising in other adjoining districts, or if it engages with any of the interlinkages that Banks has raised in response to the Inspectors previous questions. It is matters such as these and the uncertainty that they bring into plan drafting that speak to the need for clear commitments to future joint working and monitoring.

c) Do the adjoining local planning authorities accept the initial OAHN of 867 dwellings per annum, as Policy SS1 indicates in the submission Local Plan? Do the adjoining local planning authorities accept the revised OAHN of 790 dpa, and if so, are they basing their housing need in the context of that OAHN figure?

- 2.11 Banks has not seen an explicit agreement between the relevant councils that any specific housing requirement is acceptable. Whilst it is accepted that agreement between the councils is important in the discharging of the Duty to Cooperate, Banks notes that this does not amount to the figure itself being sound. Banks submits that the housing requirement ought to be higher in the Local Plan and that York has the capacity to meet a higher requirement. What is inferred in the latest Duty to Cooperate evidence (EX_CYC_23) is that there is limited capacity in those adjoining authority areas, so the onus is on York to meet as much of its own need as it can, leaving no stone unturned in doing so.

Q. 2.3 What methodological approach has been used to establish the OAHN, and does it follow the advice set out in the Planning Practice Guidance (under the heading ‘Methodology: assessing housing need’ – as updated on 20 March 2015)? In particular:

a) The OAHN identified is founded on the 2016-based population projections as its starting point. What is the justification for using these projections? What is the justification for the household formation rates used to ‘convert’ the population projections into household projections? Overall, is the general approach taken here justified and consistent with the Planning Practice Guidance?

- 2.12 As Banks has explained in response to question 2.2 a) there are significant concerns regarding the use of the 2016 projections, and the approach taken to produce the OAHN which relies, in particular, on a shorter term understanding of household formation than the 2014 figures. Moreover, the approach taken appears to only go part way to fulfilling the PPG, in that it omits an assessment of the local circumstances (or at least the latest iteration of the SHMA evidence fails to engage or explain the reduction in the overall requirement despite the local evidence suggesting a continued need) as was required by the following passage:

“The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.”

(Reference ID: 2a-015-20140306)

b) Have market signals been taken into account?

- 2.13 The 2017 iteration of the SHMA concluded that there was a need for an uplift in the housing needs figures to reflect market signals and the acute need for Affordable Houses. Reported at paragraphs 5.6 and 5.7 is the following:

“In response to both market signals and affordable housing need we have advocated a 10% uplift to the OAN. In line with the PPG this was set against the official starting point of 867dpa. The resultant housing need would therefore be 953dpa for the 2012-32 period.

“The level of housing need identified is somewhat higher than the previous SHMA reflecting the increased starting point but also the inclusion of a market signals uplift.

This OAN would meet the demographic growth in the City as well as meet the needs of the local economy.”

- 2.14 Banks notes two issues with this, first, as previously explained, this statement conflates the issues of market signals and affordability but second, and more critically, this was ignored by the council and so market signals have been considered in evidence but not transferred into policy.

c) Have employment trends been taken into account? If so, how, and what conclusions are drawn in this regard?

- 2.15 Banks considers that the employment trends considered for the plan are dated, and do not reflect the stated aspirations of the Council. The principle to match jobs growth and housing numbers is welcomed but the calculations are in urgent need of review.
- 2.16 The latest housing needs update (Jan 2019) explains that the Employment Land Review (ELR) update identified ‘scenario 2’ as the most appropriate basis for jobs growth to support the OAHN. This equates to 650 jobs per year. However, the housing needs update relies on the ELR reports and conclusions drawn from documents drafted and published in 2016 and 2017. Moreover, the latter report goes as far as to suggest that a jobs growth figure of 806 per year is forecast and Banks believe that this ought to be considered in the OAHN.
- 2.17 Furthermore, Banks is also concerned that the simple ‘rolling forward’ of job growth that was forecast up to 2031 into the years up to 2037 is neither effective nor appropriately justified by the Council.

d) Does the OAHN provide enough new homes to cater for those taking up the new jobs expected over the plan period?

- 2.18 As explained above, Banks is of the view that the OAHN will not support the predicted jobs growth, this is brought into particular focus by Local Plan paragraphs 1.35 and 1.36 which conclude “...that the Council is [not] tempering its economic ambition for the city. It continues to believe that local interventions such as the ‘Growth Deal’ with Government will promote faster growth in key sectors..” which will drive a stronger growth in jobs than the rather pessimistic view of 650 new jobs a year.

e) Overall, has the OAHN figure been arrived at on the basis of a robust methodology?

- 2.19 Banks is of the firm view that the answer to this question is ‘no.’ Observations of the conclusions in the SHMA iterations include:
- First, that there is an apparent conflation of ‘market signals’ and ‘affordable housing’ to create a suggested uplift of 10% or 15%. The now superseded planning practice guidance suggested that this was a two-step and sequential process, albeit each element was a matter of judgement, so to combine the two considerations would not conform to the guidance.
 - Second, the 2107 SHMA update reported (para. 3.17) the calculation of affordable housing need (573 dpa) against the proposed policy proportion of 30% requiring a plan target of 1,910 dwellings a year. Whilst it was correctly noted that there is no requirement to meet all of this need a 10% uplift to meet a significant challenge is derisory at best. The figure of 573 is 66% of the demographic baseline figure of 867 and moreover, there is no mention of the increased Affordable Housing need identified in the 2016 addendum of 627 dpa.

- Third, it is surprising that it took three iterations of the SHMA (not including any previous versions created by 'Arup') to conclude that an uplift to engage with the challenge of affordable housing was necessary, but it is positive to see this assessment within the evidence base.

2.20 The Council Executive's response, however, to the SHMA 2017 is disappointing. The concern is the attempt to place a 'policy-on' assessment on the OAHN through the comment that the conclusions "*attach little or no weight to the special character and setting of York and other environmental considerations.*" It was not in the gift of the Council to make this decision as part of setting of objectively assessed needs, clearly this should have been part of the plan making exercise.

2.21 Whilst this 'policy-on' position appears to have receded to some extent in the 2019 housing needs update: the 2016 projections do not provide a robust starting point for an assessment of OAHN; there is insufficient consideration given to economic growth and trends; and, the need for affordable housing is under reported.

f) Does the revised OAHN figure (790 dpa) take account of all housing needs, including the need for affordable housing and any need that may be the consequence of any shortfall in housing delivery before the plan period?

2.22 The Affordable Housing need has not been reassessed since the publication of the SHMA in 2016. The figure of 573 dpa is reapplied to the 2019 calculation update. There is no mention of the 627 dpa identified in the 2016 SHMA addendum. The same under appreciation of the scale of the challenge is applied to the OAHN figures in this latest iteration of the SHMA as with the version in 2017. Against a potential admittedly 'theoretical' need for 1,910 dpa a 15% uplift to only 557 dpa is suggested. This will not go far enough to either:

"...meet the full, objectively assessed needs for market and affordable housing" of the NPPF (2012); or
"...make sufficient provision for: a) housing (including affordable housing)..." of the NPPF (2019).

2.23 The above considerations need to be placed into context alongside data from MHCLG data table 1008C (affordable housing (A.H.) delivery) and 122 (net additional (net adds.) dwellings):

| YEAR | 2014-15 | 2015-16 | 2016-17 | 2017-18 | 2018-19 |
|---------------------------|---------|---------|---------|---------|---------|
| A.H. | 128 | 100 | 136 | 69 | 56 |
| NET ADDS. | 284 | 691 | 378 | 1,296 | 449 |
| A.H. AS % OF TOTAL | 45% | 14% | 36% | 5% | 12% |

2.24 This data shows that on average 98 affordable dwellings a year have been completed which represents 22% of completions. In the last two years the overall delivery and percentages have been very low. This will result in needs continuing to increase and the situation is only exacerbated by the continued loss of Affordable Housing units to the 'Right to Buy' which in the last five years have been above 50 a year and were 79 in 2016-17 (MHCLG table 685).

Q. 2.4 Policy SS1 aims to ensure that around 650 new jobs are provided annually. Does either the OAHN identified or the housing requirement set out in Policy SS1 cater for the homes needed to meet this level of economic growth? What is the relationship between the number of new jobs anticipated and the OAHN and/or the housing requirement?

- 2.25 As Banks has set out in response to questions 2.3 c) and d) the annual figure of 650 jobs is out-of-date and the OAHN ought to be increased so that the housing can keep pace with jobs growth that is forecast to be closer to 800 jobs per annum.

THE HOUSING STRATEGY: THE HOUSING REQUIREMENT

Q. 2.5 Policy SS1 aims to ensure that “a minimum annual provision of 867 new dwellings [are delivered] over the plan period to 2032/33 and post plan period to 2037/38”.

a) Is this 867 figure an annual average, or is it a commitment to providing at least that number during every year of the plan period and post plan period? Is it intended to be a net figure?

- 2.26 Banks considers that the OAHN is a higher figure than 867 dwellings per annum. Notwithstanding this view, the policy should be clarified so that the requirement is expressed as a ‘net’ figure to be met as a minimum each year of the plan period.

b) For the avoidance of any doubt, what period of time is the plan period?

- 2.27 The Local Plan states a plan period of 2017 – 2032/33, but some policies e.g. Green Belt and Employment requirements refer to 2037/38. Banks is of the view that the policies should match the plan period. This would remove confusion and inconsistency from policies in the submitted plan. Banks also believes that an early review of the plan will be necessary – if a housing need number that does not closely reflect the ‘Standard Methodology’ is found sound – to engage with increasing housing needs. Therefore, to ensure that Green Belt boundaries can endure beyond the plan period these should be considered through an early review, or land should be removed from the Green Belt now and safeguarded for development at the time of the early review.

c) Is the “plan period” the period of time for which the Plan and its policies will be in force as part of the development plan? Related to this, is it legitimate, or possible, for a development plan to include policies which purport to dictate or direct development beyond the “plan period”, as Policy SS1 appears to?

- 2.28 As stated above, Banks is of the view that the plan period and the time horizons for its policies ought to be consistent to ensure compliance with national policy and the preference for at least a 15 year plan and the effectiveness of the policies.

d) At 867 dpa, the housing requirement is higher than the OAHN of 790 dpa. Why?

- 2.29 Banks considers that neither the housing requirement of 867 dpa nor the OAHN of 790 dpa is robust or sound. The need should be identified as at least 1,000 dpa and the SHLAA demonstrates that there is capacity for this level of housing.

e) Does setting a housing requirement that is higher than the OAHN undermine the Council’s arguments in relation to the justification for releasing land from

the Green Belt for housing purposes – that is to say, does it reduce the degree to which “exceptional circumstances” exist, in principle, for amending the Green Belt boundaries for housing delivery purposes?

- 2.30 As noted above Banks considers that the proposed housing requirement is not higher than the identified need, therefore the exceptional circumstances are not undermined. On the contrary the evidence submitted by Banks demonstrates that the need is such in York that Green Belt boundaries ought to be reviewed in a comprehensive and consistent manner to release land to meet the very acute housing needs of the city.

Q. 2.6 Will the housing requirement ensure that the need for affordable housing will be met?

- 2.31 Banks is firmly of the view that the answer to this question is ‘no.’ As is set out in response to question 2.3 f) the need for Affordable Homes is under reported in the SHMA and recent delivery and sales through the ‘Right to Buy’ have all contributed to the situation getting worse.

Q. 2.7 Overall, is the housing requirement set out in the plan underpinned by robust evidence and is the Plan sound in this regard?

- 2.32 The only answer that Banks can give to this question is ‘no.’ As is set out above – and in the previously submitted housing need and supply report – the ‘requirement’ in the submitted plan is evidentially lower than the actual needs in York. The requirement is not underpinned by robust evidence and the contrived position that the Council has created to attempt to show that they are planning positively to over deliver against a limited need is neither effective nor convincing.

THE HOUSING STRATEGY: THE HOUSING SPATIAL DISTRIBUTION

Q. 2.8 The Plan’s development strategy is set out in Policy SS1. This provides five spatial principles to guide the location of development through the plan. In broad terms, is this the most appropriate spatial strategy?

- 2.33 No. There is no spatial element to the principles, rather a list of criteria that should be considered. We believe that the policy should define the broad locations for the growth of the authority area, e.g. urban extensions to the City of York, new settlements etc.
- 2.34 The development strategy also fails to recognise that all land within the authority area is within the general extent of the Green Belt and therefore the spatial strategy should focus on the identification of sites which promote sustainable patterns of development, land which is unnecessary to keep permanently open and sites which would not affect the five Green Belt purposes as set out in NPPF. Policy SS1 fails to acknowledge that the removal of sites from the general extent of the Green Belt is a key part of the development strategy to ensure the authority meets its housing needs in full.
- 2.35 A number of specific constraints are identified across the five spatial principles including ‘green corridors’ and ‘areas with an important recreation function’. It is important that such terms are properly defined within the Plan but nevertheless we believe such terms are far too detailed to be included as part of the overarching spatial principles, these are secondary considerations that sit beneath the key overarching strategy.

Q. 2.9 Policy SS1 says that the location of development will be guided by the five spatial principles. However, the Plan strategy does not quantify the spatial distribution of new housing across the Plan area.

a) What is the overall distribution of new housing proposed through the Plan? Should it be clearer in this regard? Does the key diagram provide sufficient illustration of the broad distribution of new housing across the Plan Area?

2.36 The overall distribution of housing should be clearer. There does not appear to be any settlement hierarchy and the Council have not adequately demonstrated that they have promoted the most sustainable patterns of development as required by NPPF.

2.37 Whilst it is accepted that any key diagram provides a high level visual representation of the broad distribution of new housing, we believe the version in the plan is unclear.

b) What level of new housing is directed towards the city centre and other parts of the Plan Area?

2.38 As set out in 2.9 a) the distribution of housing is not clear. It is important that the level of new housing within and adjacent to the City of York and other settlements is clearly set out. This would help to demonstrate whether the proposed strategy is the most appropriate and sustainable.

c) How has this distribution been arrived at and what is the justification for it?

2.39 We do not believe that adequate justification has been provided for the distribution of new housing. The 2014 Draft Plan focused on a number of sustainable urban extensions to the main city. Following a change in political administration work on the plan was halted and started again yet most of the evidence that underpinned the 2014 draft plan is still referred to. There is no justification for the change of approach which now relies on fewer housing sites the majority of which are in more peripheral locations to the main city.

d) Is the distribution consistent with the overall approach set out in Policy SS1?

2.40 As set out in response to question 2.8, policy SS1 does not provide a spatial framework to guide new development. The restrictive principles outlined in Policy SS1 could apply in any geographical location.

e) Is the distribution of housing supported by the SA and will it lead to the most sustainable pattern of housing growth?

2.41 No we do not believe this is the case. Sufficient weight has not been given to the distribution of housing that will lead to the most sustainable pattern of development with all objectives appearing to carry the same weight.

2.42 It is also important that the sustainability appraisal is updated to reflect the latest available information. For example, for Malton Road (site ref: 180), the only likely significant negative effect identified in the SA is for objective 13 (minimising flood risk). Following the preparation of a flood risk assessment and modelling work which Banks Property submitted as part of our representations to the proposed modifications, the Environment Agency have updated the flooding maps for this part of York and the site

is no longer affected by flooding. It's identification as a housing site would not result in any significant effects, demonstrating it to be a suitable site for inclusion in the Plan.

f) Has the Green Belt and/or any other constraints influenced the distribution of housing and, if so, how?

- 2.43 It is unclear if this is the case. In any case, we do not believe that the distribution of housing is justified in terms of NPPF with regard to releasing land from the Green Belt. As set out in our representations to the Proposed Modifications (June 2019), the council have not taken into account the need to promote sustainable patterns of development, not include land in the Green Belt which is unnecessary to keep permanently open or areas which do not meet the five purposes of the Green Belt.
- 2.44 The evidence relied on is out-of-date and pre dates not only the 2019 NPPF but the 2012 framework. The use of rear garden fence lines as Green Belt boundaries constitutes poor defined inner edges that fail to create strong defensible boundaries that will remain permanent throughout the plan period and beyond. This fails to comply with the NPPF when local authorities need to define boundaries for the first time.

Q. 2.10 Overall, is the spatial distribution of housing justified and is the Plan sound in this regard?

- 2.45 For the reasons stated above, we do not believe that the spatial distribution of housing is justified or sound. There are no spatial policies in the Plan which justify how much development should be located within and adjacent to the City of York with the balance being identified in more peripheral locations.
- 2.46 The 2014 draft plan included a greater focus on sustainability and urban extensions to York including Malton Road and the spatial strategy should be revisited to ensure sustainable patterns of development are being promoted within the Plan.