STATEMENT IN RESPONSE TO INSPECTOR'S MATTERS, ISSUES AND QUESTION TO THE EXAMINATION OF THE YORK LOCAL PLAN

MATTER 2

NOVEMBER 2019

LANGWITH DEVELOPMENT PARTNERSHIP LTD

PARTICIPANT REF: 378

Q70385

Contents

Appendices

1 Introduction

1.1 Langwith Development Partnership (LDP[1]) is the principle landholder of the land proposed to be allocated under Policy ST15, which is a strategic allocation (Policy SS13), in the draft submitted City of York Local Plan ("Local Plan"). A new sustainable garden village proposed in the south east of the City is a key component of the Local Plan's spatial strategy for housing delivery. The allocation of a new garden village in this part of the City is based on sound and sustainable planning principles. A new settlement is necessary, sustainable and appropriate in this part of the City if the City of York Council (CYC) are to meet their housing needs sustainably.

1.2 LDP have made representations to each of the relevant stages of the Local Plan preparation (Regulation 18, Regulation 19 and the more recent Modifications to the Regulation 19 Plan)[2].

1.3 LDP have demonstrated throughout the Local Plan process the Local Plan's spatial strategy in part based on delivering a new garden village in this general location, south east of the City is sound in principle.

1.4 Whilst this Hearing Statement is not specifically concerned with the specifics of the allocation, Matter 2 of the first stage of Hearings are of relevance to the strategic allocation of a new garden village in this part of the City.

1.5 This Statement deals with the various questions raised under Matter 2 including those under the following sections:

(a) The House Marketing Area (HMA)

(b) The Objectively Assessed Housing Need (OAHN)

(c) The Housing Strategy: The Housing Requirement

(d) The Housing Strategy: Spatial Distribution

1.6 This Statement has been prepared by Quod, but with input from Understanding Data (who prepared a critique of CYC's OAHN analysis in 2016 and 2019, submitted in response to the consultation on the Regulation 18 Local Plan and the Main Modifications to the Regulation 19 Plan respectively).

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[1] Langwith Development Partnership Ltd (participant ref: 378) (LDP) is a joint venture formed by Sandby and the Oakgate/Caddick Group who control all the land required to deliver the new garden village known as Langwith. LDP have joint land holding interests in the south east part of the City, to the north of Elvington (south of the A64). Both parties, have jointly, and individually, been participants in the preparation of the City of York Local Plan (the Local Plan) for over six years.

[2] Representations were submitted by LDP, (or the companies that constitute LDP) including those (i) in September 2016 to the City of York Local Plan – Preferred Sites Consultation (June 2016), (ii) and the later submission of a Site Promotion Document (Quod) in October 2017, followed by (iii) representations (in March 2018) to the City of York Local Plan - Publication Draft (February 2018) and finally (iv) representations to the York Local Plan Proposed Modifications (June 2019) and associated Background Documents, in July 2019.

2 The Housing Market Area (HMA)

Question 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 administration areas separately.

a) Is this correct? If so:

2.1 The City of York HMA overlaps between Authorities and markets, most notably Selby District Council ('SDC') whilst the HMA extends over both Local Authority boundaries as well as others. Despite the cross-boundary housing market, CYC/SDC and others have concluded it appropriate in the context of the Duty to Cooperate (DtC) to proceed on the basis of York addressing their own housing need. This is primarily due to each Local Authority's Local Plan being at different stages of preparation. Table 2.1 outlines the varying stages of plan preparation in the surrounding authorities, all of which are completely different trajectories, and with different plan period coverage.

Table 2.1: Strategic Local Plan Status in Neighbouring Authorities

Local Planning Authority	Local Plan Status	Plan Period Covered
Rydale	'Rydale Plan – Local Plan Strategy', adopted September 2013.	2012-2027
	No review currently programmed.	-
Hambleton	'Core Strategy DPD', adopted April 2007.	2006-2021
	'New Local Plan for Hambleton', Reg. 19 published July 2019.	*2014-2035*
Selby	'Core Strategy', adopted October 2013.	2011-2027
	'New Local Plan' – Reg. 18 not published, expected early 2020.	*2022–2037 (est)*
East Riding	East Riding 'Strategy Document', adopted April 2016.	2012-2029
	Local Plan Review – first of two Reg. 18 versions published Nov 18.	*2021-2040 (est)*
Harrogate	'Core Strategy', adopted February 2009.	2008-2023
	'Harrogate District Local Plan' – EiP took place Jan/Feb 2019. Inspector's Report delayed until after General Election.	*2014-2035*

2.2 It is entirely appropriate in these circumstances for CYC to adopt a pragmatic approach and progress their Local Plan on the basis of meeting the City's OAHN within its own administrative boundary. This is especially the case, due to the complications of progressing Local Plans within different Authorities on a joint timetable and, most notably in this case, where CYC have not had a Local Plan for over 60 years. There is clearly a compulsion within York to adopt a Local Plan as expedient as possible.

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

2.3 CYC have set out their approach to dealing with meeting its own needs and ensuring the wider needs of the HMA within which York falls (including that part of the HMA within SDC) have been met in their letter to the Inspectors of July 2018[3].

2.4 Notably, GL Hearn have been responsible for determining CYC and other adjoining local authorities housing needs; the various work undertaken has been undertaken on a consistent basis and their understanding of the inter-relationships between the sub housing markets and the of the various local authorities . This work by GL Hearn has brought together a strong understanding of the complex relationships within the area, and the Housing Market Area and the recent SHMAs[4].

2.5 It is recognised in the NPPG[5] that HMAs can be defined by using 3 different sources of information, including house prices/rates of change (in house prices), household migration and search patterns and contextual data (such as travel to work, school, retail, etc catchments. CYC's SHMA (2016)[6] uses a range of information sources but primarily focussed on migration and commuting patterns[7]. It demonstrates that through a triangulation of that data, CYC shares a HMA with SDC[8]. The data sources for defining York's HMA appear appropriate, albeit of some age now, having been drawn together almost 3 ½ years ago, and with the data sources some years younger than the SHMA itself.

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

2.6 As noted above, each Local Authority has been on a different timetable for producing their Local Plans, and notably in relation to SDC and CYC, given the relationship between both Authorities, LDP understand they each have agreed to meet their own OAHN within their own Authority boundaries.

2.7 It is entirely appropriate in these circumstances for CYC (and SDC) to proceed on this basis. However, for the reasons outlined in LDP's Representations to the Proposed Modifications[9] (and earlier representations[10]). LDP consider that CYC's OAHN[11] is unsound (see Section 3).

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[3] EX/CYC/7.

[4] SHMA (2016) [CD051] and SHMA Update (2017) [CD050] provide a strong and robust basis for determining York's HMA.

[5] NPPG - 011 Reference ID: 2a-011-20140306.

[6] Section 2 of CD051.

[7] Paragraph 2.103 of CD051.

[8] Paragraph 2.103 of CD051.

[9] PM SID 378.

[10] PM SID 378.

[11] EX/CYC/09 considerably underestimates the true housing need in the City.

3 The Objectively Assessed Housing Need

Question 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?*

3.1 LDP do not believe that the revised OAHN (based on EX/CYC/9) is robust[12].

3.2 To address the substantive issues LDP have with EX/CYC/9 it is useful to review why a further update was deemed necessary.

3.3 The Inspector's early concerns about the CYC's approach is found in the original questions set out their letter of July 2018[13], namely:

3.3.1 "*Precisely what it is about the SHMA Update that the Council considers "speculative and arbitrary" is not apparent to us. We are also unsure why you consider the SHMA Update to be "too heavily reliant on recent short-term unrepresentative trends". We therefore ask you to elaborate on these shortcomings in your evidence.*"

3.4 In EX/CYC/7 (Nov 2018) CYC set out context for the further OAHN work (EX/CYC/9) but did not expressly answer the original questions of EX/INS/1.

3.4.1 "Following the receipt of your letter, we have been in dialogue with both the Local Plans and Housing Planning Policy teams at the Ministry of Housing, Communities and Local Government (MHCLG) regarding the assessment of housing need in the light of these recent developments. We understand that a revised Standard Methodology is due to be issued for consultation within the next month or so. As you will be aware, national policy guidance on this issue is in a state of flux. Whilst York's Local Plan has been submitted and is therefore subject to the transitional arrangements, applying the NPPF 2012, we take the view that in order to achieve a robust and up-to-date Plan, the implications of the Government's emerging position should also be clarified and understood before a final OAN figure is settled through the examination process. Indeed, the 26.10.18 consultation noted that issues regarding the standard methodology may be raised at examination. Subject to the issue of the draft guidance as anticipated above, we expect to conduct this review and to update you on its conclusions by early in the New Year."

[12] PM SID 378 Appendix 3 Summary pages 3-6.

[13] EX/INS/1.

3.5 The Inspectors noted in EX/INS/2 that:

3.5.1 "EX/CYC/9 does not provide this review of standard method results or assess the impacts of an OAHN significantly below that of the standard method."

3.6 LDP note that EX/CYC/9 does not address these questions, and it is not a complete SHMA update. For example, it does not update the economic forecasts and does not address previous issues identified as important within York, such as the relationship between growing student numbers and the housing market, which were addressed in the 2016 SHMA (SD051). Notably it does not explore the dramatic difference of a 44.1% reduction in results from the 2014 vs 2016 based projections at 2039 (GL Hearn use the lower 2016 based uncritically) that this change warrants.

3.7 GL Hearn and CYC do not address differences between their approach and the new 2018/19 NPPF based Local Housing Need, which suggests that housing need in the City is substantially different to that suggested by GL Hearn.

3.8 The original 2017 published York LHN/standard method figure was 1,070 dpa[14] using the later affordability data, Understanding Data calculate this to be currently 1,069 dpa[15].

3.9 Attached at **Appendix 1** is a summary of OAHN figures promoted by participants at the Examination of the Local Plan. This shows a broad range of housing need in York, but notably the vast majority identify a significantly greater OAHN than that calculated by GL Hearn.

*b) Does the 13,152 total housing figure identified at the year '2032/33' in the SHLAA Figure 6: Detailed Housing Trajectory Updated (7009dpa OAHN) [**EX/CYC/16**] include meeting housing need arising in parts of the 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 2016 [**SD051**]?*

3.10 Not so far as LDP understand CYC's position; see response below to 2.2(c).

c) Please see response to Question 2.2c.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?

3.11 LDP understands that CYC's OAHN housing figure does not seek to meet housing need for any adjoining districts. It has already been demonstrated (Table 2.1) that the adjoining authorities local plans are at differing stages of adoption/preparation.

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[14] 2017 CLG 'Housing need consultation data table'
https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals

[15] PM SID 378 (Appendix 3 – pages 49-51).

3.12 The impact of the 2016 based projections is not as universal as CLG's reaction to them would suggest. LDP set out at **Appendix 2** sets out the impact across the immediate sub regional area. It should be noted that for some the 2016 projections are higher than the 2014 set, and that the scale of reduction the other way (2016 lower than 2014) is much more significant in York as against neighbouring areas. This is why sensitivity testing based on alternative assumptions specific to York local circumstances should be taken into account[16].

3.13 LDP make no comment on the impact this might have on neighbouring authorities view on York's approach.

Question 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')? In particular:

3.14 LDP's view expressed in its representations to the Local Plan[17] is that the approach used to establish the OAHN in EX/CYC/19 is not robust or sound and does not follow the best practice established around the interpretation of the PPG. LDP note that there has not been a detailed answer from the CYC on the questions around OAHN that the Inspectors asked in July 2018 (EX/INS/1), in particular:

"Precisely what it is about the SHMA Update that the Council considers "speculative and arbitrary" is not apparent to us. We are also unsure why you consider the SHMA Update to be "too heavily reliant on recent short-term unrepresentative trends". We therefore ask you to elaborate on these shortcomings in your evidence."

3.15 EX/CYC/9 does not address these issues and follows the methodology of the previous report. It is unclear whether CYC's unease remains with the methodology of its own SHMA[18], or whether the use of the far lower 2016 based household projections to create a much lower starting point negates this previous methodology unease (see later).

a) The OAHN identified is founded in 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?

3.16 There is no justification for using the 2016 based projections unless the aim is to reduce the OAHN. They are not robust, do not represent the recommended set in the 2019 NPPF, do not aid the response to a worsening affordability issue and do not reflect the current demographic growth pressures happening in York.

[16] HEDNA 2015 IDa-017.

[17] PM SID 378 Appendix 3 Summary 3-6.

[18] SD050.

3.17 The established concern with the 2016 projections is that they predict a decline in projected household growth which reflects some key methodological changes employed by ONS that have resulted in a (projected) fall in the underlying population growth, and lower levels of household formation amongst younger age groups, and not actual local trends. Whilst the 2016 projections for York are a meaningful change they do not necessarily render the assessments based on 2014 projections as out of date[19].The 2016 projections are not considered to be sufficiently robust to be used given the Government's longstanding original and continued key objective of significantly boosting the supply of homes, which stems back to the 2012 NPPF and subsequent editions including the new approach under the 2019 NPPF.

3.18 The reasons to not use the 2016 based projections (and to use the 2014 based) in the specific case of York are explained in LDP's representations[20]. Notably, in other recent Examination Inspector reports the weaknesses of the 2016 projections have been largely acknowledged and the use of the 2014 projections have been accepted. While Guildford's Inspectors concluded the use of 2016 projections were not inappropriate. In these representations, LDP set out specific reasons why the Guildford Inspectors report is not relevant to York.

3.19 Since then we find the conclusions of the Wycombe Local Plan's Inspector's report[21] informative, in which he noted that:

> *"28.The 2016 – Based Household Principal Projections for England were issued shortly after the completion of the LP hearing sessions in September 2018. The projections indicate that household growth in Wycombe has slowed significantly and that the number of households shown in the 2016-based household projections is approximately 40% lower than that shown in the 2014-based household projections. Additional evidence presented in respect of this matter indicates that should the OAHN be revisited in light of the latest projections it is likely to result in a reduced housing requirement for the District.*
>
> *29.However, there are some doubts about the reliability of the 2016-projections and their reliability for plan making. Notwithstanding this, the PPG on HEDNA makes clear that the household projections are only the starting point for establishing a housing requirement figure. For these reasons and having regard to the importance of boosting the supply of housing, it would be unjustified to revisit the Plan's evidence base and delay adoption of the Plan in the light of the 2016-based projections."*

3.20 In Wycombe the Council used the 2014 based projections despite the availability of the (lower) 2016 based set, which the Inspector endorsed as appropriate.

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[19] HEDNA 2015 IDa-016.

[20] PM SID Appendix 3 pages 44-51.

[21] https://www.wycombe.gov.uk/uploads/public/documents/Planning/New-local-plan/Local-plan-examination-2018/WDLP-Report-Final-with-appendices.pdf

3.21 LDP note[22] also that there are issues of consistency with the work by GL Hearn, when compared to work undertaken for another Council recently. Notably, GL Hearn have taken the opposite view in their work for City of Oxford[23], as highlighted in LDP's previous submission. Notably, GL Hearn in the Oxford SHMA continued to use the 2014 based projections to inform the starting point despite the availability of the 2016 set. In York, although the concerns about the robustness of the 2016 based household projections is acknowledged in EX/CYC/9, the 2016 based household projections with their significantly lower starting point is accepted without the type of robust scrutiny and challenge such a major change in projected trend would typically bring.

3.22 LDP set out, in their representations[24] to the Proposed Modifications to the Local Plan, a clear view that the 2016 projections do not represent accurately what has happened in recent years in York, and that a range of pressures which show both recent higher levels of growth and signs of increasing stress on housing markets in respect of affordability.

3.23 The annual average new households in York has been increasing since the 1990s, with 2010 plus showing an average of 920 new households per year compared to 680 a year in the 2000s.

3.24 Annual population growth is highest for the period 2011-18 (1,730) compared to the 1990's (902) and 2000s (1,649).

3.25 There is also an issue of timing. It is highly unlikely that the Government had intended for the transitional arrangements to have such a prolonged window, between submission (the trigger of qualifying for transitional arrangements) and the examination starting. CYC's current OAN is based on work published on 31st January 2019, which falls outside of the deadline for plans (in their entirety) to be examined under transitional arrangements.

3.26 LDP does not take issue with the Local Plan being examined under the transitional arrangements, but strongly sets out a reasoned and evidenced view that the 2016 household projections are not robust or suitable for use to set the starting point for OAHN, that their use in EX/CYC/9 is not warranted, explained or indeed consistent with the GL Hearn concern around their use for the city of Oxford. HEDNA 2015 is clear that household projection based estimates of housing needs may require adjustment to reflect factors which are not captured in past trends. York is a case in point.

3.27 Additionally the use of 2016 projections in the Local Plan undermines the aim to boost housing supply and tackle current growth pressures, growth pressures likely to arise from the current economic trajectory of the areas (that the plan does not respond to positively) and does not address the very clear and worsening housing affordability issue.

b) Have market signals been taken into account?

3.28 Market signals have not led to an uplift in the OAHN. They are addressed and the severity of the issue acknowledged in EX/CYC/9 however, contrary to the PPG whether the 2015 HEDNA version[25] or the latest version there is no adjustment so that this does not then influence the OAHN.

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[22] PM SID 378 Appendix 3 Pages S12-S14.

[23] https://www.oxford.gov.uk/download/downloads/id/5096/shma_update_to_2036.pdf

[24] PM SID 378 Appendix 3 Pages 14-17.

[25] HEDNA 2015 ID2a-019 & 020.

3.29 LDP's have previously noted a range of issues with the approach adopted by GL Hearn, namely:

3.29.1 Since 2013 the technical supporting work on housing market assessments has clearly recognised affordability issues in York. The 2017 SHMA (SD050) recommended a 10% uplift – this was not accepted by CYC. EX/CYC/9 recommends a 15% market uplift but this was not applied.

3.29.2 The evidence is clear, and an uplift is fully justified, and LDP note an adjustment of 20% is clearly warranted. If the new 2019 NPPF approach had not led to this transition period, LPEG advice would be relevant and this uplift would be 25%.

3.29.3 The previous 2017 SHMA work suggested a 10% market signals uplift. Notably, this was rejected by CYC although for no apparent good planning reason. The 2019 work lifts this to 15% but the impact of this is not actually felt, as the economic scenario results in an OAHN (of 790). Therefore, although on paper accepting a 15% uplift there is no specific separate market signal uplift applied to combat the acknowledged affordability issues.

3.29.4 The NPPG does not specify that only one adjustment of either a market signals uplift or adjustment for economic growth is warranted. These adjustments are for quite different purposes. The correct application within EX/CYC/9 should be the application of a 15% uplift to the 790 figure (which would be higher if 2014 base used).

3.29.5 A good way of illustrating what rising (un)affordability ratio means can be seen in the statistics LDP present in their submission (Chart 5 Tables 8-13 of) – namely that:

3.29.6 In 2011 59% of all houses sales in York were between £100,000 and £200,000 – this had fallen to 33% of sales in 2018 (full year) and 22% in 2019.

3.30 **Appendix 3** compares the "market signals" of the 21 Local Authorities across Yorkshire and Humber (Y&H) for the period 2010-18. Of particular note is the fact that York had:

3.30.1 the highest house prices % increase at 36.8% higher than the England value (32.8) and significantly higher than the Y&H value (18.5).

3.30.2 the highest % increase in the affordability ratio (at 24.6%) across the Yorkshire and Humber region from 2010 to 2018 the second highest increase was Selby at 16.5%. The England value was an increase in the affordability ratio of 16.8%.

3.30.3 the 8th lowest increase in earnings at 8.9% below England (13.7%) and Y&H (12.7%).

3.30.4 the highest rental prices across Y&H in 2018.

3.30.5 the highest Rental Affordability Ratio 2018 across Y&H.

3.31 York has a higher affordability ratio[26] than a wide range of similarly sized (population) areas across the South East, South West and East of England. The relevant table and those for House Price and Affordability Ratio for Y&H.

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

3.32 Employment trends have not robustly been properly taken into account[27].

3.33 Recent employment change in CYC is higher than the 650 jobs that EX/CYC/9 relies on and is currently averaging around 790 per year. Thus, the recent employment trends are seemingly not taken into account as the PPG exhorts[28].

3.34 Across a range of economic indicators for 63 cities across England York performs strongly in economic terms, with scope for further improvements (for example in earnings).

3.35 The York Central development and jobs potential from developments at the University would lead to over an additional net 3,700 FTE[29] in York after making allowances for elements of this new provision being part of the wider general economic trajectory that an economic forecast would pick up (from a gross of around 7500 FTE) which the 2015 based economic forecast that EX/CYC/9 relies on does not factor in.

3.36 The economic value and benefits from future research activities at the University of York do not appear to have influenced the 2015 economic forecast, or the Plan's wider economic approach.

3.37 The jobs approach is not robust needs to be updated and is likely to have significantly higher outcomes, with associated impact of a on a likely higher assessment of housing need.

3.38 The current Plan and EX/CYC/9 is relying on only a single economic forecast originally produced by Oxford Economics in 2015. It is good practice to consider the blended impact of several (up to date) economic forecasts rather than to rely on a single forecast.

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[26] PM SID 378 Appendix 3 Table 14.

[27] PM SID 378 Appendix 3 Page 19-33.

[28] HEDNA 2015 21-018.

[29] PM SID 378 Appendix 3 paragraphs 3.70-3.72.

3.39 There was a previous economic forecast (see below) which seems to fit CYC's wider economic ambitions and the current reality of both of job creation, and key investments and projects. The expectation of the type of investments and projects that are currently happening, and supported by the LEP seemed to inform the previous aspirational scenario (Scenario 1) from ELR[30] and the 2016 SHMA[31] with an annual jobs target of 977 (2014-31), but which was dropped from the GL Hearn work (2017 onwards) without explanation.

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

3.40 Please refer to response to Question 2.3(c) above.

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

3.41 No; please refer to answers above. 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 the housing delivery before the plan period?

Question 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?

3.42 Please refer to response to Question 2.3c.

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

3.43 The following issues demonstrate that the approach used in EX/CYC/9 is not robust. These are:

3.43.1 Concern over the use of 2016 based projections as the starting point, and there should be 2014 based.

3.43.2 An economic and jobs approach which is out of date, unambitious and below both current and future trends of job creation, and contrary to good practice based upon a single economic forecast from only 2015.

3.43.3 Markets signals not addressed sufficiently in proportion to the severity of the issue, with no actual affordability response.

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[30] SD064.

[31] SD051 - City of York Council Strategic Housing Market Assessment (SHMA) (June 2016) (3.91mb - PDF) Table 23, Page 84.
SD064 - City of York Employment Land Review (July 2016) (7.4mb - PDF) Pages 20-21 and Table 1, Page 25.

4 The Housing Strategy: The Housing Requirement

Question 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?

4.1 The NPPF has a clear objective that the supply of new homes should be boosted[32]. Whatever is concluded to be the appropriate OAHN by the Inspectors, and LDP consider this is significantly in excess of 867 dpa, this must be set as a minimum delivery rate over the Plan period and beyond.

4.2 It is necessary for the delivery to be expressed as commitment of the Plan to ensure a delivery at an annual rate, in order that CYC's performance (in terms of demonstrating a 5 year housing land supply) can be properly understood, in order to ensure a steady delivery rate throughout the plan period.

4.3 It would benefit the Plan's clarity to define the annual provision as a net new provision, as the housing needs work undertaken by GL Hearn on behalf of CYC, and the critique by others (notably Understanding Data on behalf of LDP) express the provision as net new dwellings. It is a standard approach to assess housing needs by reference to the net additional homes required, once redevelopment and/or demolition (of existing dwellings) is taken into account.

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

4.4 The Local Plan covers a period 2017-2032/33 albeit the Green Belt boundaries have been defined to endure beyond the plan period to 2037/38. Rather than putting aside land "safeguarded", CYC have identified land for development to meet the housing needs beyond the Plan period.

4.5 This is, in part, due to the plan's spatial strategy which is predicated on the delivery of larger garden villages that are necessary to meet the City's housing needs, and which for the purpose of viability and reasons of sustainability need to be large scale. For the reasons explained in LDP's responses to Matter 3 of the Examination, the spatial strategy for the provision of garden villages, especially in the south east of the City, is a sound response to the environmental issues facing York (notably its historic setting and environment).

c) Is the "plan period" for period of time for which the Plan and its policies will be in force as part of the development plan? Related to this, it is 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?

4.6 LDP do not comment on this matter.

[32] NPPF 2012 – paragraph 47 & NPPF 2019 paragraph 59.

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

4.7 Notwithstanding LDP's views that the OAHN assessed by GL Hearn is a substantial underestimate of the true housing needs in York, it is noted that CYC consider it appropriate to provide flexibility in terms of housing provision for the Plan period given the specific context of the Local Plan. Notably, in the Green Belt Topic Paper TP1 Addendum[33] it states that it is necessary to have the added flexibility, given that the Plan is being assessed under the transitional arrangements, but there is clearly a changing policy environment, with the introduction of a new Standard Method for calculating housing need, which demonstrates (see Section 3) that the housing provision supported by the Local Plan is wholly inadequate (ie 1079dpa compared to the 867dpa of the Plan as currently drafted).

4.8 It is clear that if adopted in the current form, the Plan would soon be out of date and there is no good planning reason to progress a Plan where the latest evidence base demonstrates the Plan would not be sound.

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?

4.9 Exceptional circumstances can take many forms, and notably it has been concluded on many occasions that meeting an area's OAHN is a clear exceptional circumstance. Attached at **Appendix 4** is a schedule of Local Plans, where Green Belts have been reviewed/set due to the need to accommodate new homes, which cannot be accommodated anywhere other than within the Green Belt.

4.10 Even if it was accepted that the housing requirement is higher than the OAHN, it is clear that delivery of 790 dpas would not adequately meet the City's housing needs. That is because of the inherited shortfall that arose during the period 2012-2017[34], which suggests (according to the "Sedgfield" approach) at least 822 dpa will be required.

4.11 Moreso, it is LDP's views that CYC's assessment of OAHN is a significant underestimate of the true housing need in York, and exceptional circumstances prevail to support both a higher requirement and the scale of boundary changes to the Green Belt proposed, as well as possibly more land release.

Question 2.6: Will the housing requirement ensure that the need for affordable housing will be met?

For the reasons outlined, as the assessment of OAHN does not take account of the market conditions and affordability data, even if the GL Hearn assessment of OAHN was accepted by the Inspector, it is clear that it has not fully accounted for affordable housing need.

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

4.12 The Inspector's attention is drawn to LDP's response to Q2.3(d).

[33] EX/CYC/18 (paragraph 7.103).

[34] EX/CYC/18 (paragraph 7.103).

5 The Housing Strategy: Spatial Distribution

Question 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?

5.1 LDP consider that the five spatial principles set out in Policy SS1 are sound and provide an appropriate strategy for identifying the location of development.

5.2 Through an appropriate assessment of the various factors which shape growth, and the characteristics of York, the expression of the spatial strategy through a range of allocation is supported by LDP.

5.3 Notably, as LDP note in their Hearing Statement to Matter 3, the principles of the spatial distribution adopted in the Local Plan is considered appropriate, given:

5.3.1 The acute level of housing need within York, which is in fact greater than that currently planned for in the Local Plan.

5.3.2 The constraints on available land suitable for sustainable development, most notably within and on the edge of the existing urban areas of this historic City and its setting.

5.3.3 The consequent difficulties of achieving sufficient sustainable development without the need to release land from the Green Belt.

5.4 Whilst the spatial strategy is supported by LDP, and the evidence base underpinning the Plan, in relation to the allocation of land under Policy SS13 (allocation ST15) the Plan is unsound, for the reasons explained in the evidence of LDP[35].

Question 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?

5.5 The key diagram in the Local Plan[36] merely shows the location of strategic sites and does not express the overall distribution of quanta of new housing. For the purposes of clarification, the key diagram should be modified to demonstrate the broad distribution of new homes (quantified by reference to the number of dwellings proposed) across the Plan area.

5.6 In addition, further clarification on this matter could be provided in the reasoned justification in Section 4.

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

5.7 LDP do not comment on this matter.

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[35] PM SID 378.

[36] CD001.

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

5.8 The distribution has been determined by adopting a spatial strategy that prioritises development within urban areas, followed by sustainable urban extensions to the urban areas, whilst recognising that the heritage integrity of the City is a key planning consideration in delivering sustainable development in the City, by safeguarding a number of key elements[37] which contribute to the special character and setting of the historic city. Given the need to protect the City's special heritage character and setting, the strategy to meet that part of York's needs in new freestanding settlements beyond the ring road would help to '*safeguard the size and compact nature of the historic city, the perception of York being a free standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built up area of York with its surrounding settlement.*'[38]

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

5.9 The distribution of housing by adopting a systematic approach for meeting housing (and other) needs is explained in Section 7 of Topic Paper TP1[39] which set out the approach to prioritising development on suitable sites within the urban area, and thereafter identifying sites beyond the urban area, which would not be harmful to York's historic character and setting.

5.10 Most notably, CYC have worked with Historic England, given the heritage significance of the City, and a purposeful approach to limiting the amount of growth around the periphery of the built up area of the City was adopted, given the propensity for such development to impact harmfully on the historic City.

5.11 As a consequence, the spatial distribution of the plan which was to prioritise development within and/or as an extension to the urban area in appropriate locations, along with the provision of new garden villages, was adopted.

5.12 Notably, the provision of a new garden village in the south east of the City has a clear spatial appropriateness, given it complements and reinforces the existing settlement at and around York, which comprises a series of villages around the main urban area[40].

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

5.13 In the case of the spatial distribution of housing in the south east of the City, through a new garden village, it presents a highly sustainable pattern of housing growth, for the following reasons:

5.13.1 It will complement and reinforced the existing settlement pattern.

5.13.2 It involves a significant area of previously developed land (in the case of the Langwith proposals) the brownfield component of the site is 103 ha, with the remaining 101 ha on greenfield, whilst ST15 has a brownfield:greenfield land take of 46ha:131ha.

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[37] Section 6 of SD106.

[38] Historic England's response to the Local Plan Publication draft (2018); PM SID 118.

[39] EX/CYC/18.

[40] Appendix 4 of PM SID 378.

5.13.3 It is within a sustainable location, being proximate to a range of services, and employment (including the University, which is within easy cycle distance).

5.13.4 It is large enough to create a range of opportunities to exploit sustainability objectives, which are outlined in the Note at **Appendix 5**.

5.14 The above matters are considered in detail in LDP's representations[41].

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

5.15 Topic Paper TP1[42] demonstrates that the main influence for the distribution of housing has been the attempt to make the best use of suitable brownfield sites and underutilised land within the urban area, as well as sustainable urban extensions, but recognising that within York that such sites are constrained, in terms of availability and suitability principally by the need to protect the heritage character and setting of the City, which has ruled out many opportunities for large urban extensions, and in the alternative lead to a strategy of providing new freestanding garden villages within the Green Belt.

Question 2.10: Overall is the spatial distribution of housing justified and is the Plan sound in this regard?

5.16 The spatial distribution of housing is justified by the evidence base, and the Plan's approach to satisfying housing need firstly within the urban area, following by appropriate extensions to the urban area, and then through the provision of new garden villages.

[41] PM SID 378.

[42] EX/CYC/18.

APPENDIX 1

OAHN REPRESENTATIONS TO THE LOCAL PLAN

APPENDIX 1 – OAHN SET OUT IN 2019 REPRESENTATIONS

Reference	Consultant/Promoter	OAHN Minimum
CYC Local Plan	GL Hearn	793
See 1 below	O'Neill Associates – Various	1,070
See 2 below	Lichfield Multiple	1,225
See 3 below	DPP Planning Linden Homes	1,150
See 4 below	Carter Jonas Picton Capitol & Various	1,066
See 5 below	HBF John Mowatt LHN figure (2019 NPPF)	1,070
See 6 below	Directions Planning Consultancy	867
See 7 below	PB Planning	1,069
PM SID 231	Fulford Parish Council	532
PM SID 260	Pegasus Group (Emma Ridley) OBO Lovel Developments Ltd	1,000
PM SID 286	John Martin Pickard	480
PM SID 287	Katherine Pickard	480
PM SID 339	Barton Willmore (Chris Atkinson) OBO Barratt and David Wilson Homes	976
PM SID 345	RPS Group Defence Infrastructure	979
PM SID 357	ID Planning (Richard Irving) OBO Green Developments	953
PM SID 372	Gladman Developments (Craig Barnes) OBO Gladman Developments	867
PM SID 378	Understanding Data Quod Langwith	1,025
PM SID 581	Avison Young (Hatch Regeneris) OBO Barwood Strategic Land II LLP	1,026
PM SID 603	Savills (UK) Ltd (Rebecca Housam) OBO Retreat Living Ltd	997
PM SID 604	Turley L & Q Estates	1,000
PM SID 621	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fi	976
PM SID 918-1 91	Robert Pilcher	

NOTE continued

Notes:

Submission from several parties relying on a single OAN alternative

1. O Neill Associates

PM SID 214 O'Neill Associates (Eamonn Keogh) OBO Wendy and Richard Robinson 1089
PM SID 220 O'Neill Associates (Phillip Holmes) OBO Mr Ibbotson 1245
PM SID 620 O'Neill Associates (Eamonn Keogh) OBO Galtres Garden Village Development Group 3323
PM SID 592 O'Neill Associates (Graeme Holbeck) OBO Yorvik Homes 2699
PM SID 587 O'Neill Associates (Eamonn Keogh) OBO Shepherd Homes 2615

2. Lichfield Study

PM SID 253 Litchfields (Alastair Willis) OBO Bellway Homes 1361
PM SID 210 Litchfields (Nicholas Mills) OBO Wakeford Properties 901
Taylor Wimpey; Wakeford Properties; Persimmon Homes; Bellway
PM SID 376-1 ELG Planning (Steven Longstaff Longstaff) OBO Taylor Wimpey 2011
PM SID 376-2 ELG Planning (Steven Longstaff Longstaff) OBO Taylor Wimpey 2099
PM SID 125-1 Persimmon Homes ~ Jess Kiely 147
PM SID 125-2 Persimmon Homes ~ Jess Kiely 227
PM SID 125-3 Persimmon Homes ~ Jess Kiely 311
PM SID 125-4 Persimmon Homes ~ Jess Kiely 389
PM SID 125-5 Persimmon Homes ~ Jess Kiely 485
PM SID 125-6 Persimmon Homes ~ Jess Kiely 565
PM SID 125-7 Persimmon Homes ~ Jess Kiely 649

3. DPP Planning

PM SID 866 DPP (Mark Lane) OBO Mulgrave Properties 3759
PM SID 867 DPP (Mark Lane) OBO Yorvik Homes 3773
PM SID 598-1 DPP (Mark Lane) OBO Linden Homes Strategic Land 2825
PM SID 598-2 DPP (Mark Lane) OBO Linden Homes Strategic Land 2841
PM SID 598-3 DPP (Mark Lane) OBO Linden Homes Strategic Land 2857
PM SID 598-4 DPP (Mark Lane) OBO Linden Homes Strategic Land 2869
PM SID 598-5 DPP (Mark Lane) OBO Linden Homes Strategic Land 2881
PM SID 600 DPP (Mark Lane) OBO Shepherd Homes 2897
PM SID 601 DPP (Mark Lane) OBO Private Landowner of Former H34 2911

4. Carter Jonas

PM SID 350-1 Carter Jonas (Simon Grundy) OBO Picton Capital 1841
PM SID 350-2 Carter Jonas (Simon Grundy) OBO Picton Capital 1867
PM SID 894 Carter Jonas (Simon Grundy) OBO Karbon Homes 4037
PM SID 895 Carter Jonas (Simon Grundy) OBO Banks Property Ltd 4079

NOTE continued

5. LHN 2019 NPPF figure

PM SID 181 Gateley Legal (Andrew Piatt) OBO Gateway Developments (York) Limited
PM SID 255 Home Builders Federation (HBF) ~ Joanne Harding 1511
PM SID 182 Johnson Mowatt (Mark Johnson) OBO KCS Development 815
PM SID 582 Johnson Mowatt (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry and Hudson 2497
PM SID 583 Johnson Mowatt (Mark Johnson) OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes, and E Crocker 2513
PM SID 890 Johnson Mowatt (Mark Johnson) OBO Yorvik Homes 3993 PM SID 891 Johnson Mowatt (Mark Johnson) OBO Redrow Homes 4009
PM SID 891 Johnson Mowatt (Mark Johnson) OBO Redrow Homes 4009
PM SID 585 Johnson Mowatt (Mark Johnson) OBO Taylor Wimpey Ltd 2529

6. Directions Planning Consultancy

PM SID 401 Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Sunderland and Wilson 2377
PM SID 611 Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd 3281
PM SID 612 Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT) 3293

7. PB Planning

PM SID 594-1 PB Planning (Paul Butler) OBO TW Fields 2767
PM SID 594-2 PB Planning (Paul Butler) OBO TW Fields 2821

APPENDIX 2

SUB REGIONAL DIFFERENCES BETWEEN 2014 AND 2016 BASED HOUSEHOLD PROJECTIONS FOR THE CYC PLAN PRIOR TO 2017-33

APPENDIX 2 – SUB REGIONAL DIFFERENCES – 2014 AND 2016 BASED HOUSEHOLD PROJECTIONS FOR THE CYC LOCAL PLAN PRIOR TO 2017-33

Projection	Harrogate	Hambleton	East Riding	Ryedale	Selby	York
2014 based	4,326	2,367	12,438	2,214	4,729	13,009
2016 based	4,185	2,239	9,275	2,648	4,562	7,191
2017-33	141	128	3,163	-434	167	5,8181
%	3.3	5.4	25.4	-19.6	3.5	44.7

Note: This table is sourced from the 2014 and 2016 based sub national household projections (CLG and ONS) and is provided for information to show the changes arising from the 2016 SNHP that CLG has responded to in recommending the use of the 2014 based household projections.

APPENDIX 3

MARKET SIGNALS TABLES

APPENDIX 3 – MARKET SIGNALS (TABLES FROM PM SID 378 APPENDIX 3)

House Prices

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2010-18	2010-18 %	Trend
York	173000	175000	177000	180000	190000	210000	216500	227950	235000	62000	35.8	
Harrogate	215000	215000	212000	212600	222500	239950	258000	265000	275000	60000	27.9	
Selby	159995	158000	160000	160000	160050	166995	180000	190000	202500	42505	26.6	
Barnsley	105000	102000	105000	105000	110000	114475	117000	122500	129950	24950	23.8	
Kingston upon Hull, City of	91000	88500	89000	92000	97000	100000	105000	115000	112500	21500	23.6	
Ryedale	183000	185000	176000	183000	184999	194475	206950	216000	225000	42000	23.0	
Leeds	144000	142000	141000	143750	149000	154950	162500	169950	176000	32000	22.2	
Sheffield	130000	124950	125000	124995	131995	138000	140000	150000	158000	28000	21.5	
Wakefield	125000	120000	119000	120000	125000	129896	136000	145000	151000	26000	20.8	
East Riding of Yorkshire	145000	139950	141000	140000	149000	153000	160000	170000	175000	30000	20.7	
Kirklees	129950	124950	123000	124999	125000	132000	139950	141000	149950	20000	15.4	
North Lincolnshire	119475	115000	112500	115000	120000	124995	127000	132500	137500	18025	15.1	
Hambleton	199950	200000	203000	200000	210000	212000	220000	229000	230000	30050	15.0	
Rotherham	119995	115000	117973	122500	125000	130000	134950	133000	138000	18005	15.0	
Calderdale	124750	120000	115000	120000	124000	128000	135000	135000	140500	15750	12.6	
Bradford	120000	120000	115000	119000	120000	125000	128000	133000	135000	15000	12.5	
North East Lincolnshire	115000	110000	112000	108250	119950	118625	123250	129000	128950	13950	12.1	
Craven	175000	175750	175500	170000	174999	185000	187500	200250	195000	20000	11.4	
Doncaster	115000	110000	110000	110000	118000	124000	125000	130000	128000	13000	11.3	
Scarborough	146000	145000	140000	140000	145000	150000	145000	157000	159950	13950	9.6	
Richmondshire	192500	193500	180000	192500	185000	185000	195000	195000	200000	7500	3.9	
ENGLAND	180000	180000	181500	185000	195000	209500	220000	230000	239000	59000	32.8	
YORKSHIRE AND HUMBER	135000	130000	130000	132000	138500	143000	149950	155000	160000	25000	18.5	

Earnings

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2010-18	%	Trend
Richmondshire	19206	19655	24303	25611	25459	22844	26363	26880	26271	7065	36.8	
Ryedale	20277	21040	19599	21176	21475	23043	23103	24240	24131	3854	19.0	
Calderdale	23511	24760	23211	23708	24905	24733	26284	26869	27686	4175	17.8	
Craven	22113	21845	22527	23359	24158	22774	24326	25264	25847	3734	16.9	
Sheffield	23872	24186	24987	25688	25468	26147	26804	27185	27708	3836	16.1	
Wakefield	23546	24124	25091	24518	24480	24279	24701	25056	27233	3687	15.7	
Bradford	22798	22241	22813	23897	23530	23952	25262	25702	25908	3110	13.6	
Harrogate	24029	23501	22180	24674	24597	23861	25426	25744	27150	3121	13.0	
Kirklees	23150	22626	23254	23318	23353	22950	24619	24790	26084	2934	12.7	
Kingston upon Hull, City of	22928	23858	23366	23659	23693	24178	25553	24942	25792	2864	12.5	
Doncaster	23760	24248	24692	24088	24785	23352	24674	25066	26604	2844	12.0	
Leeds	25253	25222	25337	26496	26381	27089	28165	28317	28054	2801	11.1	
North Lincolnshire	25862	25817	26313	27501	27896	27831	28433	27505	28727	2865	11.1	
York	24346	24960	26277	27604	25880	25622	26113	26448	26522	2176	8.9	
Selby	28056	27446	26771	26977	28000	27984	28027	28085	30517	2461	8.8	
Hambleton	23425	23689	25348	22677	23748	23945	24466	23960	25293	1868	8.0	
Barnsley	23510	23465	23431	23556	23274	25864	25235	24899	25305	1795	7.6	
Rotherham	24001	23783	23068	23774	24218	25585	25230	25554	25652	1651	6.9	
East Riding of Yorkshire	24678	23510	24063	24769	24389	24024	24583	25734	26359	1681	6.8	
Scarborough	23221	23068	22541	21822	23864	25754	24526	24802	24333	1112	4.8	
North East Lincolnshire	21911	22831	24946	24305	23257	24197	24792	22265	22663	752	3.4	
ENGLAND	26265	26488	26822	27372	27485	27841	28496	29083	29872	3607	13.7	
YORKSHIRE AND HUMBER	23856	24119	24288	24933	24999	25194	25946	26309	26894	3038	12.7	

NOTE continued

Affordability Ratio

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2010-18	%	Trend
York	7.11	7.01	6.74	6.52	7.34	8.2	8.29	8.62	8.86	1.75	24.6	
Selby	5.7	5.76	5.98	5.93	5.72	5.97	6.42	6.77	6.64	0.94	16.5	
Barnsley	4.47	4.35	4.48	4.46	4.73	4.43	4.64	4.92	5.14	0.67	15.0	
Harrogate	8.95	9.15	9.56	8.62	9.05	10.06	10.15	10.29	10.13	1.18	13.2	
East Riding of Yorkshire	5.88	5.95	5.86	5.65	6.11	6.37	6.51	6.61	6.64	0.76	12.9	
Leeds	5.7	5.63	5.56	5.43	5.65	5.72	5.77	6	6.27	0.57	10.0	
Kingston upon Hull, City of	3.97	3.71	3.81	3.89	4.09	4.14	4.11	4.61	4.36	0.39	9.8	
North East Lincolnshire	5.25	4.82	4.49	4.45	5.16	4.9	4.97	5.79	5.69	0.44	8.4	
Rotherham	5	4.84	5.11	5.15	5.16	5.08	5.35	5.2	5.38	0.38	7.6	
Hambleton	8.54	8.44	8.01	8.82	8.84	8.85	8.99	9.56	9.09	0.55	6.4	
Sheffield	5.45	5.17	5	4.87	5.18	5.28	5.22	5.52	5.7	0.25	4.6	
Scarborough	6.29	6.29	6.21	6.42	6.08	5.82	5.91	6.33	6.57	0.28	4.5	
Wakefield	5.31	4.97	4.74	4.89	5.11	5.35	5.51	5.79	5.54	0.23	4.3	
North Lincolnshire	4.62	4.45	4.28	4.18	4.3	4.49	4.47	4.82	4.79	0.17	3.7	
Ryedale	9.03	8.79	8.98	8.64	8.61	8.44	8.96	8.91	9.32	0.29	3.2	
Kirklees	5.61	5.52	5.29	5.36	5.35	5.75	5.68	5.69	5.75	0.14	2.5	
Doncaster	4.84	4.54	4.45	4.57	4.76	5.31	5.07	5.19	4.81	-0.03	-0.6	
Bradford	5.26	5.4	5.04	4.98	5.1	5.22	5.07	5.17	5.21	-0.05	-1.0	
Calderdale	5.31	4.85	4.95	5.06	4.98	5.18	5.14	5.02	5.07	-0.24	-4.5	
Craven	7.91	8.05	7.79	7.28	7.24	8.12	7.71	7.93	7.54	-0.37	-4.7	
Richmondshire	10.02	9.84	7.41	7.52	7.27	8.1	7.4	7.25	7.61	-2.41	-24.1	
ENGLAND	6.85	6.8	6.77	6.76	7.09	7.52	7.72	7.91	8	1.15	16.8	
YORKSHIRE AND HUMBER	5.66	5.39	5.35	5.29	5.54	5.68	5.78	5.89	5.95	0.29	5.1	

Rental Affordability (from LPEG definition)

	LW Rent	LQ Earnings	RAR
York UA	640	1668	38
Harrogate	595	1812	33
Leeds	550	1694	32
Craven	495	1537	32
Richmondshire	500	1571	32
Ryedale	495	1643	30
Sheffield	495	1658	30
Hambleton	500	1754	29
Wakefield	450	1637	27
Rotherham	425	1589	27
North East Lincolnshire UA	397	1506	26
Selby	475	1818	26
Bradford	410	1585	26
Scarborough	420	1633	26
North Lincolnshire UA	420	1653	25
East Riding of Yorkshire UA	425	1685	25
Kirklees	425	1689	25
Doncaster	390	1588	25
Calderdale	425	1759	24
Barnsley	395	1656	24
Kingston upon Hull, City of UA	350	1484	24

NOTE continued

Affordability Comparisons in Areas of a Similar Population of York (Sorted by Affordability Ratio)

	Population	Annual HH Change(2014 based) for 2016-2026	Annual HH (16 based) for 2016-2026	Trend 14 to 16	House Price 2018	Earnings 2018	Affordability ratio 2018	2016 to 2014 difference
Aylesbury Vale	196020	1071	1192		335995	30000	11.20	121
Bath and North East Somerset	188678	445	487		325000	29990	10.84	42
Herefordshire, County of	191041	685	518		235000	23934	9.82	-167
North Somerset	212834	1026	976		250000	25871	9.66	-50
Colchester	190098	846	965		270000	28397	9.51	119
York	208163	844	427		235000	26522	8.86	-417
Bournemouth	194752	1133	693		249000	29491	8.44	-440
Luton	214658	1171	644		245000	29339	8.35	-527
Tameside	224119	592	419		140000	23506	7.71	-173
Solihull	213933	599	550		270500	35481	7.62	-49
Swindon	220363	844	677		227500	29841	7.62	-167
Northampton	225656	1123	884		204950	26974	7.60	-239
Portsmouth	214718	724	486		212000	29616	7.16	-238
Peterborough	198914	841	638		185000	27238	6.79	-203
Warrington	209704	810	666		180000	28497	6.32	-144
Bury	189628	534	350		163500	26369	6.20	-184
North Tyneside	204473	732	434		168950	27623	6.12	-298
Stockton-on-Tees	196487	501	389		145000	26203	5.53	-112
Gateshead	202419	440	281		136000	25580	5.32	-159
Calderdale	209454	788	574		140500	27686	5.07	-214

APPENDIX 4

SUMMARY OF REPORTS BY THE SECRETARY OF STATE'S INSPECTORS FOR LOCAL PLANS WITH GREEN BELTS

Appendix 4 – Reports by the Secretary of State's Inspectors for Local Plans with Green Belts

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
Wycombe District Council	Local Plan	19.08.2019	32, 82-95, allocation specific alterations to GB: 137, 139-140, 146, 148-149, 153-155	**85**: *"The findings of the Green Belt review concluded that there were 10 sites within the designation that were suitable for release and that the development of these sites would result in the provision of an additional 1,139 new dwellings and 17 hectares of new employment land. To accommodate this level of development, changes are proposed to the Green Belt boundary which would result in the removal of approximately 77 hectares of land from the designation. This equates to approximately 0.5% of the District's Green Belt."* **86**: *"The combination of all of the sites identified as suitable for development within, and outside the Green Belt, would result in the provision of land for the development of 10,927 new dwellings (83% of the OAHN) and 21 hectares of new employment land within the District (66% of the OAEN). The unmet need for 2,275 new dwellings will be met, through the DtC, in Aylesbury Vale. The remaining 10 hectares of new employment land will be delivered in the FEMA outside the District."* **137**: Policy HW8 - Land off Amersham Road including Tralee Farm, Hazlemere - *"The site could accommodate 350 dwellings and associated public open space. It is anticipated that the allocated site will be brought forward in conjunction with the adjoining site known as 'Land Off Earl Road' which is in Chiltern District. The site is situated within the Green Belt and adjacent to the AONB. The allocated site, which comprises approximately 12 hectares of land currently occupied by agricultural buildings, warehousing, a former equestrian centre and some residential dwellings, is enclosed largely by residential development and is located adjoining the Tier 1 settlement of High Wycombe. The conclusions of the GB2 Assessment indicate that the Green Belt parcel, which contains the allocation: only fulfils the Green Belt purposes defined in the NPPF relatively weakly; is in a sustainable location for growth; capable of being removed from the Green Belt; and suitable for the proposed use. Having regard to my conclusions on Issue 1 and 4, and considering the evidence presented, I consider that exceptional circumstances exist to justify the alteration of the Green Belt boundary to remove the site for housing development."*
City of Bradford Metropolitan District Council	Local Plan	18.07.2019	41-46, 73	**41**: *"CBMDC has identified the exceptional circumstances needed to justify the release of Green Belt land, in order to fully meet the development needs for housing and to support the regeneration and long-term economic success of the district. Evidence in the SHLAA confirms that insufficient land can be identified outside of the Green Belt to fully meet identified housing needs; some 11,000 dwellings are likely to have to be accommodated on Green Belt land, given the availability and constraints on non-Green Belt land."* **73:** *"Some participants were particularly concerned about the potential impact on the Green Belt, some of which would be lost as a result of meeting the proposed level of housing required. The NPPF confirms that Green Belt is one of the restrictive policies which may constrain the ability to fully meet objectively assessed needs. However, CBMDC has fully examined the impact of the proposed level of development on the Green Belt and has shown that a sustainable pattern of development can be provided by making significant, but limited and focused amendments to Green Belt boundaries, without fundamentally undermining the purposes and functions of the Green Belt, as allowed for in the NPPF. As I have found earlier in my report, the exceptional circumstances justifying the alteration of Green Belt boundaries have also been demonstrated."*
Nuneaton and Bedworth Borough Council	Local Plan	11.06.2019	64-68, 104-132, 176, allocation specific alterations to GB: 143-156.	**66**: *"The scale of need is such in the Borough (factoring in Coventry's unmet need) that there are not enough low performing parcels. Accordingly, the Council has been justified in considering low-to-medium performing parcels and within those areas where the purpose and function of the wider Green Belt parcel was not unduly compromised, particularly in relation to preventing neighbouring towns merging into one another and checking unrestricted sprawl. I consider this an appropriate approach in establishing exceptional circumstances. Furthermore, it is important not to lose sight that high performing parcels of Green Belt are not being contemplated as part of this Plan. As a consequence of the Plan's proposals 41% of the Borough (3,275 ha) would remain Green Belt."* **67**: *"The permanence of Green Belt must be given great importance. However, similar substantial weight applies to meeting the needs for homes and jobs in a way which addresses climate change through sustainable patterns of development. It is a balance which can be tested as part of preparing Local Plans. It is not the case that Green Belt boundaries are immutable. As demonstrated through the Joint Green Belt Study, SHLAA, ELR, SA and Housing Topic Paper, the Council has examined all reasonable non-Green Belt options and demonstrated these would be insufficient to meet the need identified. Other recent Local Plans in the same HMA have found exceptional circumstances to alter the boundaries of the West Midlands Green Belt. The submitted NBBP is not out of step with neighbouring authorities."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
Rugby Borough Council	Local Plan	04.06.2019	66, 159-168, allocation specific alterations to GB: 169-203	**66**: *"I have considered the proposed allocations under issues 4 and 5 below in the light of this evidence base and the representations submitted on them. For the reasons detailed there, I have concluded that the SUEs at South West Rugby and Coton Park East are appropriate as part of the proposed development strategy and their impacts capable of mitigation and that exceptional circumstances exist for the alteration of the Green Belt boundaries to justify the relevant allocations at the MRSs at Binley Woods, Long Lawford, Ryton on Dunsmore, Stretton on Dunsmore, Wolston and Wolvey"* **159**: *"Paragraph 83 of the NPPF requires that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan. The exceptional circumstances put forward by the Council are that these sites are required to provide for rural housing needs; to support the role of the MRSs as sustainable rural communities; and to ensure a 5-year housing land supply on adoption of the Plan."* **168**: *"The above factors combined with the absence of opportunities within settlement boundaries in principle justify altering the boundaries of the Green Belt around the MRSs. I consider below whether exceptional circumstances are fully demonstrated for each proposed MRS allocation having regard to the specific Green Belt harm which would be likely to be caused and other relevant considerations."*
Stevenage Borough Council	Local Plan	22.05.2019	78-87	**78: "***For the reasons I have already set out, accommodating future development needs within Stevenage Borough is far more difficult than in other areas where land is more readily available. It is also the case that because the town is relatively new (built post-war) there are few opportunities for redevelopment, other than on a small scale. Consequently the capacity of Stevenage is extremely limited. Moreover neighbouring authorities are also reviewing their Green Belt boundaries to meet their own needs. Therefore, it would be unlikely that Stevenage's needs could reasonably be met in neighbouring authorities on land outside the Green Belt."* **81**: *"The only way that Stevenage can meet its current identified housing need is to release any suitable land from the Green Belt. Through their extensive and thorough Green Belt review the Council have identified site HO3 (north of Stevenage), in the Plan as being suitable for housing development. In the assessment of defined areas of land against Green Belt purposes this site is considered (as part of a larger parcel of land – N4) to make a limited contribution to Green Belt purposes in all regards, with the exception of preventing merger where it is identified as making a significant contribution."* **84: "***In summary, there is a pressing need for housing within the Borough that cannot be met outside of the Green Belt. The value of the Green Belt has been thoroughly assessed by the Council and although it found that here a significant contribution comes from preventing the merging of settlements, there would still be a gap between settlements, even if the site in North Hertfordshire is allocated in their Plan and subsequently developed. Taking into account all of these factors I find that this site would be the most suitable, along with others, to meet the housing need in Stevenage. As such, exceptional circumstances exist to justify the release of this site from the Green Belt."*
Guildford Borough Council	Local Plan	25.04.2019	78-90	**79**: *"Guildford has a pressing housing need, severe and deteriorating housing affordability and a very serious shortfall in the provision of affordable homes. There is additional unmet housing need from Woking. There is no scope to export Guildford's housing need to another district; the neighbouring authorities in the housing market area are significantly constrained in terms of Green Belt and other designations and both have their own significant development needs. The overall level of provision will address serious and deteriorating housing affordability and will provide more affordable homes. The headroom can also accommodate the likely residual level of unmet need from Woking."* **86**: "*Subject to the proposed Green Belt alterations, the Plan is capable of meeting objectively assessed needs with adequate flexibility. The alterations to the Green Belt boundary would have relatively limited impacts on openness as discussed in Issues 10 and 11, and would not cause severe or widespread harm to the purposes of the Green Belt. The allocations at A25 Gosden Hill Farm and A26 Blackwell Farm would be planned urban extensions rather than sprawl. Site A25 together with the allocations at Send and Burnt Common/Send Marsh would be visually and physically separate, as discussed in Issue 7 and would not add to sprawl or coalescence. A35 Former Wisley airfield would include a substantial amount of previously developed land and is separate in character from its wider Green Belt surroundings. The other Green Belt sites would be adjacent to settlements and would have very localised effects on openness. There is therefore no justification for applying a restriction on the quantity of development."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
Kirklees Council	Local Plan	27.02.2019	30, 44-50	**47**: *"The assessment work shows that, although there are a range of potential housing sites within towns and villages, there is insufficient capacity to deliver the identified housing requirement on non-Green Belt land. The Council's Green Belt Review Supporting Document indicates that the shortfall amounts to some 11,500 dwellings."* **49**: *"Without the release of Green Belt land in Kirklees a substantial level of new dwellings, potentially amounting to about one third of identified need, would not be delivered. Therefore, in the absence of reasonable alternatives, and given the benefits associated with local housing and economic growth, I conclude that exceptional circumstances exist in principle to justify the release of land from the Green Belt to deliver OAN for housing in Kirklees. This is supported by the Council's Green Belt review and site assessment work, as detailed in Issue 7 below, which illustrates that the release of land to meet OAN needs could be accommodated without significantly harming the overall integrity of the Green Belt in Kirklees. However, it is subject to an assessment of environmental capacity and demonstration of exceptional circumstances on a site by site basis, as covered later in this report."*
Barnsley Metropolitan Council	Local Plan	03.01.2019	91-118 & 239	**92**: "*Significant changes to the Green Belt boundaries are proposed in the plan together with the removal of approximately 654 hectares of land for employment and housing development, greenspace and for safeguarded land. This is approximately 2.2% of the Borough's Green Belt."* **93**: "*The potential capacity of non-Green Belt housing sites within Urban Barnsley and the Principal Towns which are the principal locations for new development was assessed as 6100 dwellings with planning permission and 8994 on sites identified in the plan outside the Green Belt. The shortfall of approximately 6000 dwellings established that there was an insufficient supply of housing sites to meet objectively assessed need for housing without development of Green Belt land."* **118**: "*Subject to the MMs outlined, I conclude that there is a compelling case in principle for the release of land from the Green Belt to meet the objectively assessed need for employment and housing and for additional safeguarded land. This is, however, subject to exceptional circumstances being demonstrated for the alteration of Green Belt boundaries to justify the removal of specific sites from the Green Belt for development, a matter dealt with in Issue 5. Exceptional circumstances have been demonstrated to add land to the Green Belt. In addition, the Green Belt boundary alterations to rectify anomalies, errors and reflect updated circumstances are appropriate and soundly based."* **239**: "*The plan's site allocations are based on a logical and appropriate set of criteria and assessment methodology, SA and HRA. Subject to the MMs, the employment, mixed use and housing allocations are soundly based. Where necessary, exceptional circumstances have been demonstrated to justify alterations to the Green Belt boundary and the removal of land from the Green Belt to meet the objectively assessed need for employment, housing and identify areas of safeguarded land."*
Borough Council of Poole	Local Plan	13.11.2018	63-77, allocation specific alterations to GB: 83-87	**74**: *"In summary, there is a robustly and objectively identified need for 14,200 new dwellings in Poole to 2033 and this level of new housing is required to support likely economic growth in the area. However, despite the plan strategy of exploiting to the maximum land outside of the Green Belt, there is insufficient such land to accommodate this requirement, there being a shortfall of around 1,300 dwellings. Unlike a number of housing allocation sites elsewhere in the Borough, the evidence shows that the location and nature of sites UE1 and UE2 are suitable/viable for a large proportion of much-needed family homes and 40% affordable housing which would be of particular benefit to Poole, over and above benefits in relation to the meeting of the overall need for housing."* **77:** *"Overall, having regard to the significant housing (including affordable and family homes), community, leisure and economic growth benefits which would result from sites UE1 and UE2, the absence of non-Green Belt land on which to accommodate the necessary development and the limited harm which would be caused to the Green Belt, I conclude that the Council's judgement that exceptional circumstances exist to alter the Green Belt boundary in connection with these sites is a sound one. Moreover, subject to the above-mentioned modifications, allocations UE1 and UE2 are positively-prepared, justified and effective."* **83: "***The plan proposes the removal from the Green Belt of a tract of land between existing built development at Creekmoor and the A35 (parcel 3 in the Green Belt Review). Policy PP20 allocates the majority of this land for a new school and playing fields (A2), although smaller eastern parts of it are allocated by policy PP9 for housing (site U14, around 45 homes), by policy PP35 for safeguarding of the park and ride facility and by policy PP24 for the retention of existing public open space. Site U14 would make a small, but meaningful contribution towards meeting housing needs and the park and ride facility will continue to be of benefit in promoting use of alternatives to the car within the urban area – an objective central to the plan as a whole."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
East Hertfordshire Council	Local Plan	23.10.2018	59-64, allocation specific alterations to GB: 65-73	**61: "***All options have been explored: brownfield land has been assessed and prioritised; significantly higher densities in urban areas have been discounted because of the harm to local character, and a much larger range of smaller sites in the GB has been discounted because they could not bring forward the infrastructure necessary to support the quality of development needed in the District. Additionally, neighbouring authorities are also reviewing their GB boundaries to meet their own needs. The studies are comprehensive and demonstrate that in the absence of any reasonable alternative, the release of GB land for development is needed for the Plan period and beyond to provide land for homes."* **62: "***In summary, East Herts seeks to meet its housing requirement within the District, as do its HMA partners and there is no scope for the homes to go elsewhere. Housing need is acute and the supply and suitability of land outside the GB is constrained. Without release from the GB, there would not be enough homes to meet the needs of people within East Herts. As such, exceptional circumstances exist to justify the release of land from the GB."* **73: "***In summary, there has been a rigorous process of balancing the importance of the GB and the impact of development against the benefits. In each case the sites are the best and most sustainable, long term options contributing significantly to meeting needs of the District. Careful design, suitable landscaping and planting will mitigate impacts on GB. There is an acute need for housing and not building on the GB would mean that people in East Herts would not have homes. Therefore, there are exceptional circumstances for removing these areas from the GB."*
Rotherham Metropolitan Borough Council	Sites and Policies Document	27.06.2018	37 – 40, 106, 117	**39: "***Together with the IIA, which includes an assessment of other considerations including sustainability, location and constraints, the Green Belt Review documents are a sound basis for the review of Green Belt boundaries and the identification of safeguarded land in the RSPP. In my view this work constitutes the second stage in establishing whether exceptional circumstances exist to justify change to Green Belt boundaries. Apart from those Green Belt boundaries where changes are recommended in my report I accept that exceptional circumstances have been demonstrated that justify the other changes to Green Belt boundaries set out in the RSPP."* **40: "***Consequently I conclude that the review of Green Belt boundaries in the RSPP and the identification of exceptional circumstances to justify that boundary review is soundly based, apart from those instances identified in my report."* **106:** "*I have already found that, apart from H84, exceptional circumstances exist to justify changing Green Belt boundaries to accommodate housing allocations in the submitted plan. However, exceptional circumstances also need to be demonstrated in those cases that have emerged during the Examination where revisions to allocation boundaries also involve changing Green Belt boundaries*." **117: "***In summary, I conclude that the changes to the boundaries of the housing allocations identified above, and any associated Green Belt boundary changes, are justified and will ensure that the relevant policy is effective."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
London Borough of Redbridge Council	Local Plan	15.03.2018	41-47, 65-68, allocation specific alterations to GB: 69-86	**43: "***The first is that without Green Belt sites the relevant housing requirement would not be met contrary to the aims of the NPPF and that there would not be general conformity with The London Plan. As explained above the yield envisaged from within the built-up area is realistic and there is no suggestion that obvious candidates for development have been omitted. Furthermore, the estimates of capacity have sought to maximise densities as far as possible"* **45**: *"In short, the Council has done all it reasonably can to meet its housing requirement from existing 'brownfield' sites and to optimise potential, but the result is that a shortfall of just over 900 dwellings would occur."* **46: "***There are two further factors that support the release of Green Belt sites. The first is that the recent record of housing delivery in Redbridge has been poor. In the five years from 2010-2015 the average number of completions was 359 per annum. Compared to the relevant housing requirements for those years there has been a shortfall of 2,149 units. Furthermore, the objectively assessed need for Redbridge is 34,296 over the plan period according to the updated Outer North East London Strategic Housing Market Assessment (SHMA) (CED003). The housing required by Policy LP1 equates to only 51% of the objectively assessed need so that the "gap" between supply and need is a substantial one. Without greenfield allocations this position would be even worse. These considerations mean that it is important for the Council to 'up its game' in terms of housing delivery as far as possible."* ***86:* "***There are exceptional circumstances to warrant altering the Green Belt boundary to allow housing development at Billet Road and King George and Goodmayes Hospital sites. This is because of the limited contributions they make to Green Belt purposes, locational and site specific matters, the provision of new education and health facilities and the need for releases to meet the requirement for housing. These sites would promote sustainable patterns of development as referred to in paragraph 84 of the NPPF. However, when the overall loss of playing pitch provision is added into the balance that is not the case for Oakfield and Ford Sports Ground. Once spaces of this nature are gone they are gone for good. In response to my advice (IED012) the Council proposes to remove these allocations from the RLP."*
Croydon London Borough Council	Local Plan and CS Partial Review	27.02.2018	196	**196:** *"The exceptional circumstances for amending Green belt boundaries by the removal of three areas of land are clearly set out in section 2 of the Council's Review of Metropolitan Green Belt and Metropolitan Open Land July 2016 (evidence document LBC-07-803). The principal reason, other than a desire to reinforce the protection given to each piece of land by ensuring that it is correctly designated, is that they do not form part of a wider area that checks the unrestricted sprawl of London as a whole. This includes Sanderstead Plantation, which is clearly separated from Green Belt land to the south by a ribbon of development. I therefore consider that these three de-designations are correctly arrived at and their inclusion in the plan does not make it unsound."*
Waverley Borough Council	Local Plan	20.02.2018	33, 70-76	**33: "***The plan proposes that land is released from the Green Belt at Godalming, Milford, Witley, Elstead and Chiddingfold. The amount of land is relatively modest and this report concludes that the release of each of those sites would not have a substantial effect on the function of the wider Green Belt and that strong new Green Belt boundaries could be established."* **71: "***As previously discussed, there is a pressing need for housing in Waverley, and a serious issue of housing affordability. Delivering the housing to meet the needs of present and future generations is a key aspect of the social dimension of sustainable development. The Council has acknowledged that it is not possible to meet identified housing need solely within its towns and villages and has recognised that the implementation of a sustainable spatial strategy will require a proportion of development to be located on greenfield sites outside the main towns and larger villages, some of which fall within the Green Belt. The Council therefore commissioned a Green Belt Review, which was published in two parts in August 2014."* **75: "***The areas of land to be released from the Green Belt in the submitted plan as modified are sufficient to cater for housing needs over the plan period and no further land will need to be released from the Green Belt in Local Plan Part 2. There is a pressing need for new housing which should be delivered in accordance with the spatial strategy and sustainability objectives of the plan, and this need is such that the selective release of limited areas of land from the Green Belt, in the areas chosen, is justified and would not fundamentally undermine the purposes served by the Green Belt. The detailed changes are dealt with below under the relevant sections on Godalming and the villages, but considered strategically, these changes are justified by exceptional circumstances."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council	Joint Core Strategy	11.12.2017	163, 167	**163**: *"Therefore, taking full account of constraints and the outcomes of cross-border exploration, removal of land from the GB is needed, so far as is justified, to contribute to housing provision and the five year supply. In coming to this conclusion, I have considered paragraph 14 of the NPPF. For the GB releases identified below, I find that the adverse impacts of removing land from the GB would not significantly and demonstrably outweigh the benefits of contributing towards housing and other development needs. Nor are there policies within the NPPF that indicate that development on this land should be prevented in principle."* **167**: *"There are exceptional circumstances for GB release at four of the five proposed strategic allocations within the GB. These are Innsworth (plus land at Longford), South Churchdown, Brockworth and North West Cheltenham. However, exceptional circumstances do not exist for GB release at the fifth proposed strategic allocation of North Churchdown"*
Coventry City Council	Local Plan	06.12.2017	99, 106-108, allocation specific alterations to GB: 125-140, 141-144, 149, 153	**99**: *"Initial analysis through the SHLAA pointed to approximately 17,000 new homes being capable of being delivered in the existing urban area, representing 80% on brownfield land. However, changes to Green Belt boundaries would be required to accommodate homes to meet Coventry's housing need. As outlined earlier in this report, it was identified that it would not be possible to provide all the required housing in Coventry without there being significant and unacceptable impacts on historic landscapes and the natural environment. It was shown that a proportion of development would need to be provided in the wider Warwickshire HMA area. Also, options to meet the development needs of Coventry more sustainably may exist adjacent to the City's boundary."* **108**: *"Unless some of the Green Belt is released, a substantial level of new dwellings -amounting to nearly one third of the planned supply - would not be delivered. The scale of potentially unmet need in the City is exceptional. The selective release of parcels of Green Belt to provide in the region of an additional 7,000 dwellings would make a very substantial contribution towards meeting the shortfall. However, even with the release of the Green Belt and greenfield sites the Plan will leave a shortfall of nearly 18,000 dwellings that will need to be met elsewhere in the wider HMA. The DtC requires neighbouring authorities in the HMA to help meet the shortfall, in line with the MOU. It also requires that Coventry City Council should seek to maximise housing land provision within its own administrative boundary to meet the identified need. The release of Green Belt sites is necessary to do this."* **153: "***For the above reasons I conclude that, subject to the MMs that are necessary for soundness, the Plan complies with national planning policy in its approach to the Green Belt; that the allocations of Green Belt land, including the SUEs at Eastern Green and at Keresley, would not have a significant effect on the purposes of including land in the Green Belt, either alone or in combination with the other allocations of land in the Green Belt and are justified and deliverable; and that no other Green Belt or greenfield allocations are necessary. Furthermore, the allocated sites are appropriate and deliverable and the detailed requirements for their delivery are clear and justified."*
Warwick District Council	Local Plan	21.09.2017	Allocation specific alterations to GB: 206-213, 217-255, 264-296, 342-343	**208: "***There are very limited opportunities for housing development on any scale within the built up area. Other than one area of land at Crackley (see below), there is no potential to allocate housing sites on the edge of the urban area without altering the boundary of the Green Belt."* **209: "***These factors, along with the scale of housing requirements and limited opportunities outside of the Green Belt elsewhere in the District, amount to exceptional circumstances which justify altering the boundaries of the Green Belt around Kenilworth."* **251:** *"Given the scale of housing requirements and its role as a focal point for growth in delivering the spatial strategy, there is a need to identify sites for a significant amount of housing at Kenilworth. There are very limited opportunities to do so within the built up area or on sites not currently within the Green Belt. There are exceptional circumstances to justify altering the boundary of the Green Belt to accommodate housing development."* **296: "***In light of the above and my wider conclusions in relation to land to the south of Coventry there are exceptional circumstances which justify altering the boundaries of the Green Belt at Kings Hill. The proposed further site allocation (H43) put forward by the Council is required to ensure that the Local Plan is justified, effective and consistent with national policy."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
Dacorum Borough Council	Site Allocations Plan	12.07.2017		**38: "***The Borough is heavily constrained by Green Belt which has resulted in a limited number of 'reasonable alternatives'. Indeed the CS Inspector found that the Council could not meet all of its objectively assessed housing need without a review of the remainder of the Green Belt land."* **62: "***As detailed in paras 9 and 10, the CS identifies these specific allocations to be necessary and recognises that they will require changes to the Green Belt boundary and this was deemed sound by the CS Inspector. I have determined that the precise boundaries of these allocations are soundly-based. Having regard to this, the adopted CS and all other matters relevant to these allocations I concur with the Council that the exceptional circumstances exist to justify the removal of these sites from the Green Belt."*
Birmingham City Council	Local Plan	10.01.2017	214-219	**214: "***Assessments of the contribution that the Langley and Peddimore sites make to the purposes of the Green Belt, as defined in NPPF paragraph 80, are made in PG1. Given their location, neither plays any significant role in preventing the merger of neighbouring towns or in preserving the setting and character of historic towns. In my view, preserving their Green Belt status is not essential in order to encourage the recycling of derelict and other urban land, given the clear evidence of a shortage of land to meet Birmingham's overall development needs. The decision to release these two defined areas of land for development will not lead to "unrestricted sprawl", and both have defensible boundaries formed by main roads and topographical features."* **216: "***Birmingham is not the only local planning authority area that faces difficulties in providing sufficient housing land to meet the needs arising within its own boundaries. But the scale of potentially unmet need in the city is exceptional, and possibly unique. Without strategic Green Belt release, there are sites for around 46,000 new dwellings – only just over half the objectively-assessed need for 89,000. The release of Green Belt to provide an additional 5,000 dwellings at Langley over the Plan period, and a further 350 dwellings at Yardley, would make a very substantial contribution towards meeting the shortfall. For the reasons set out above, the evidence does not support any additional strategic residential allocations in the Green Belt."* **219: "***In my view, this combination of factors means that exceptional circumstances exist to justify alterations to the Green Belt boundary in order to allocate the SUE site at Langley (policy GA5), land for housing at the former Yardley sewage works (policy GA8) and the strategic employment site at Peddimore (policy GA6). In the case of Yardley, MM22 is needed to set out this rationale, as it is currently absent from the reasoned justification to policy GA8."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
Vale of White Horse District Council	Local Plan	14.12.2016	27, 76-88 (housing sites 1 to 4)	**86: "***In summary there is an objectively-assessed need for more than 20,000 new dwellings in the Vale during the period to 2031. Whilst the majority of these dwellings will be located in the South East Vale and Western Vale areas it is appropriate to provide for some housing in the Abingdon-on-Thames and Oxford Fringe Sub-Area, in particular to meet the future housing needs of people already living in this area. However, the Council's evidence shows there is minimal potential to provide for this housing within the existing main settlements in the area and Abingdon, Botley, Cumnor, Radley and Kennington are closely bounded by Green Belt or land subject to other constraints. It would not be a sustainable solution to meet the increasing housing needs of these settlements distant from them in the villages or countryside beyond the Green Belt. Housing on sites 1-4 (on GB) would be well-related to existing settlements and their services and for access to both Abingdon town and Oxford city centres, including by public transport, cycling and walking. Evidence also indicates that housing on these sites could be delivered quickly."* **87**: *"I recognise that the Green Belt around Abingdon, Kennington and Radley is much valued by many people and the alteration of its boundaries would not be entirely without harm. However, the Council's proposal to remove from the Green Belt housing sites 1,2 3 and 4, enabling some 1500 or so dwellings to be built, would have only limited impacts on the function of the Green Belt, primarily being localised encroachment of the countryside."* **88**: *"Balancing all of these factors I conclude that the Council's assessment that the exceptional circumstances exist to justify removal from the Green Belt of housing allocation sites 1, 2, 3 and 4 is a soundly based one."*
Gateshead Council and Newcastle Upon Tyne City Council	Core Strategy and Urban Core Plan for Newcastle and Gateshead	26.03.2015	53, 106	**51:** *"These matters have been addressed. The capacity of the urban areas has been carefully assessed, many inset towns and villages are designated as Growth Areas, and development beyond the Green Belt has been regarded as unsustainable to meet Newcastle's and Gateshead's needs. The Councils have determined that the Green Belt Growth Areas are the most sustainable locations outside the urban area which are consistent with the CSUCP's spatial strategy (policy CS1) of creating thriving communities and a more prosperous economy. For these reasons the Councils contend that exceptional circumstances exist."* **53: "***As indicated above, sustainable development is at the forefront of the Councils' approach and they have determined that Green Belt releases are a necessary component of the sustainable development of their areas, as set out in policy CS1 "Spatial Strategy and Sustainable Growth". Alternative strategies have been tested and found to be less sustainable. Thus in principle exceptional circumstances exist and, subject to my conclusions on individual allocations under issues 7 and 8, the chosen strategy is sound."* **106: "***The analysis of housing and employment sites in Newcastle and Gateshead is predicated on my finding that in principle, following the assessment processes addressed under issues 2 and 3, the Councils' proposals to release land from the Green Belt to meet objectively assessed housing and employment needs are sound and satisfy the exceptional circumstances test of the Framework."* **155: "***As with consideration of the Newcastle sites, the analysis which follows is predicated on my finding that in principle, following the assessment processes addressed under issues 2 and 3, the Councils' proposals to release land from the Green Belt to meet objectively assessed housing and employment needs are sound and satisfy the exceptional circumstances test of the Framework. Exactly the same factors apply as are outlined in paragraphs 106-107."*
Lichfield District Council	Local Plan	17.02.2015	122, 207	**122: "***Green Belt boundaries should only be altered in exceptional circumstances. Given that there is an alternative, more sustainable, site outside the Green Belt capable of helping to meet both the Council's and Rugeley's housing needs then it is reasonable for the Council to select that site."* **207: "***Nonetheless, the additional sites selected by the Council are in Green Belt and land should be released from Green Belt only in exceptional circumstances. In my judgement the lack of more sustainable sites outside the Green Belt to meet the identified need for housing in a way that is consistent with the Plan's urban and key centre strategy amounts, in this instance, to the exceptional circumstances that justify the release of Green Belt land at Deanslade Farm and Cricket Lane and their allocation for development (together with additional housing land at Fradley East) as proposed in MM12 – MM24. I am also satisfied that the additional sites selected by the Council are the most suitable having considered reasonable alternatives."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
Cheshire West and Chester Council	Local Plan	29.01.2015	74-75,	**74:** *"On this basis there is a residual need for at least 830 additional dwellings to achieve the proposed level of growth (5,200 dwellings) and to provide flexibility should some sites not come forward as envisaged."* **75:** *"There is insufficient capacity within the urban area to deliver the amount of housing growth planned for Chester, which as I have concluded above, is There is insufficient capacity within the urban area to deliver the amount of housing growth planned for Chester, which as I have concluded above, is necessary to sustain its role. Diverting some of this growth to other parts of the Borough would not achieve this key objective. It is also important to ensure that a reasonable range and choice of deliverable housing land is available. I consider therefore that these constitute the exceptional circumstances necessary to justify altering the Green Belt at Chester in principle."*
Rushcliffe Borough Council	Local Plan	22.12.2014	64, 89	**64**: *"As for the other sustainable urban extensions, I agree with the Council that the need for new housing and economic development in Rushcliffe provide the exceptional circumstances for altering the tightly drawn Green Belt boundary in the Borough. The site which contains Nottingham (Tollerton) Airport with its runways and prominent buildings is not wholly open countryside. Development here provides the opportunity to re-use brownfield land at the airport. Polser Brook and Grantham Canal provide potential defensible boundaries to the north and east. Structural planting could be used to create a strong green edge limiting the visual impact of new development, as the land is relatively flat. The proposed site would be physically and visually separate from Tollerton and Bassingfield villages, providing such measures were taken."* **89:** *"There is convincing evidence that the level of development set out in Policy 2 of the Local Plan cannot be delivered without removing significant amounts of land from the Green Belt. As explained under Issue 1 above, the need for sustainable development to provide an uplift in new housing provision and support economic growth by accommodating new employment constitute the exceptional circumstances to alter the Green Belt boundaries in Rushcliffe."*
Broxtowe Borough Council, Gedling Borough Council and Nottingham City Council	Aligned Core Strategies	17.09.2014	67-70, 111	**67:** *"However, the work which has been done to identify the site and will continue to take it forward has been undertaken by the Council as a democratically elected local planning authority. It considers that it has made its decisions in the best interests of the Borough and its people, particularly those who now or in the future will need a home of their own. Having regard to the housing requirements and limited availability of alternative, sustainable sites, the Councils' decision to allocate this site in the ACS meets the exceptional circumstances' requirement as set out in the NPPF for the alteration of Green Belt boundaries. Field Farm's inclusion as a strategic allocation in the ACS is justified."* **70:** *"the Toton location has good sustainability credentials for new development, whether or not HS2 goes ahead, being in the south of the Borough and adjoining the main built up area of Nottingham. It is within walking distance of the new tram terminus with park and ride facilities. Although the road network is very busy and local people question its ability to accommodate additional traffic, the responsible transport authorities have considered the impact of new development and are satisfied that the network could cope, with appropriate improvements. I share the Councils' view that the potential for land at Toton to help meet the requirements for housing and mixed use development in Broxtowe Borough constitutes the exceptional circumstances needed to remove the land from the Green Belt. Its potential to maximise the economic benefits from the proposed HS2 station reinforces the Councils' case for changing the Green Belt boundary at Toton."* **111: "***The NPPF continues the well-established planning policy of protecting Green Belt land. The Green Belt boundaries are drawn tightly around Nottingham, and to promote development beyond the Green Belt's outer edge would extend travel to work and for other purposes in an unsustainable fashion. Areas of safeguarded land exist in Gedling Borough, but these are unlikely to meet all the plan area's development requirements outside the main built up area. I agree with the Councils that the exceptional circumstances required for alterations to Green Belt boundaries exist."*

Council	Local Plan	Adoption	Relevant Paragraphs	Inspector Commentary
Bath and North East Somerset Council	Local Plan	10.07.2014	165, 205, allocation specific alterations to GB: 209-217, 234	**165**: *"I consider that there are the exceptional circumstances to justify removing land from the Green Belt and for major development within the AONB. The need for housing and the benefits of additional housing in this location at Bath outweigh the harm that would arise, taking into account the great weight that must be given to protecting the AONB and heritage assets. The Council's decision to allocate this site represents positive planning and is justified. This allocation is needed to make the plan sound."* **205***: "Overall, there would be a loss of Green Belt in a sensitive location, but the fundamental purpose of the Green Belt here would still be achieved. There would be a loss of well appreciated countryside and the opportunity for informal recreation. There would be no other significant harm. The allocation would achieve 220 - 250 dwellings in a highly sustainable location at the most sustainable town in the district after Bath. Of these dwellings, 30% would be affordable. The allocation would also provide additional employment to complement housing growth in the town. There are no better alternative sites at Keynsham (see below) which could replace the contribution to housing and employment that this site would make. Overall, there are the exceptional circumstances to justify removing land from the Green Belt. The Council's decision to allocate this site represents positive planning and is justified."* **216:** *"Overall, there would be a loss of Green Belt, but not in a sensitive location and the wider purposes of the Green Belt in this area would be maintained. The wider visual impact would be limited. There would be no other significant harm. The allocation would achieve 180 -200 dwellings in a location that offers some alternatives to the use of the car. Of these dwellings, 30% would be affordable. There are no better alternative sites at Keynsham (see below) which could replace the contribution to housing that this site would make. There are the exceptional circumstances to justify removing the land from the Green Belt and the Council's decision to allocate this site represents positive planning."*
South Gloucestershire Council	Local Plan	11.12.2013	49, 140	**49:** *"The Council has set out the exceptional circumstances to explain why it is proposing to release two areas of land from the Green Belt in the North Fringe. It believes there is no requirement to identify further areas in the short term but that does not guarantee boundaries will not need to be altered towards the end of the plan period. In this respect, the Council has not had regard to planning guidance. This places a responsibility on local planning authorities to consider longer-term development needs when preparing local plans in order to avoid having to alter Green Belt boundaries at the end of a plan period"* **140:** *"The Council is advocating future housing needs are met in a limited number of locations on the periphery of the (Bristol) urban area and at two freestanding towns on the outer edge of the Green Belt. This is a sustainable approach and one which I consider should be endorsed."*
Hyndburn Borough Council	Local Plan	19.01.2012	64-65	**64:** *"The new housing allocation at Huncoat Colliery is effectively a replacement for a site previously allocated in the HBLP at Central Huncoat. This site is no longer available, following HBC's resolution to protect the land for open space, reflecting strong views from the local community. Issues about the future of this land will be determined in the SADPD. Insufficient land exists within the existing urban area to provide for this scale of housing development (c.400 dwellings) without eroding existing environmental quality and open spaces. This strategic allocation is needed to ensure the Borough has sufficient housing land to meet its housing needs over the plan period, and to provide a large site, well located to provide for high-quality family homes. The need to make qualitative improvements to the housing market and provide "aspirational" housing within a high quality environment is a key objective of the PLMAA & Housing Strategy and the SHMA. This site is referred to in the PLSG, and would make a significant contribution to the quantitative and qualitative housing needs of Hyndburn, as well as complementing the proposed strategic employment site."* **65**: *"The site is currently in the Green Belt, and the Green Belt & Huncoat Topic Papers and other statements outline the exceptional circumstances to justify releasing this Green Belt land and confirm that it would not compromise the functions of the Green Belt in this locality. The lack of sequentially preferable alternative sites within the urban area and the need to provide land for high quality houses are conclusive reasons justifying its release. The site is well located, with access via the WHLR (Phase 1), partly funded by the developers. As a former colliery, the site is likely to be subject to some development constraints and, although there are few deep mine shafts, landowners and prospective developers confirm that there are no overriding constraints to its development for housing."*

APPENDIX 5

SUSTAINABLE GARDEN VILLAGES – THE SUSTAINABILITY MERITS

APPENDIX 5 - SUSTAINABLE GARDEN VILLAGES - THE SUSTAINABILITY MERITS

1 Introduction

1.1 This note refers to various policy documents and good practice guidance, which demonstrate the key sustainability merits that arise from Garden Villages (GVs).

2 Policy and Guidance

Town and Country Planning Association Best Practice Guidance in Urban Extensions and New Settlements

2.1 The Guidance was published in 2007 by the Town and Country Planning Association (TCPA) and sets out the key sustainable merits of new settlements as well as urban extensions. These include:

- Higher densities with a mix of housing types and tenures;
- Opportunities to create green infrastructure networks;
- Enabling opportunities for green technologies and infrastructure; and
- Increases in land values.

Eco-Towns Prospectus

2.2 The Eco-Towns Prospectus was published in 2007 by CLG.

2.3 Although the document is of age and no longer in circulation, the points made on how sustainable GVs can be is still relevant. These are:

- Delivering a range of house types and tenures that meet local demand;
- Providing homes for workers to live closer to where they work;
- Ability to test for new technologies to achieve zero carbon;
- Self-sufficient communities;
- Provision of a range of facilities within the town such as schools, leisure facilities and good quality business space; and
- A greater quantity and quality of green space that can enhance biodiversity.

Eco-Towns Supplement to (the now revoked) Planning Policy Statement 1 (PPS1)

2.4 The Supplement was published in 2009 by CLG. It sets out a range of standards that can be achieved through the design of eco-towns. These include:

- Opportunity to ensure energy emissions related to the built environment in eco-towns are zero or below;
- Designed with climate change in mind;
- Delivering a range of housing types and tenures;
- Creation of mixed-use communities that reduce unsustainable commuter trips;

- Take advantage of significant economies of scale and increase in land value to deliver new technology and infrastructure such as for transport, energy and community facilities;
- Ability to prioritise walking, cycling and public transport nodes to reduce the reliance on private cars; and
- A greater quantity and quality of green open spaces.

Garden Communities Prospectus

2.5 The Garden Communities Prospectus was published by the MHCLG in August 2018.

2.6 It sets out the Government's vision and expectations for high quality GVs across the country.

2.7 The Prospectus identifies a critical mass of 1,500-10,000 new dwellings for GVs and a minimum of 10,000 for Garden Towns.

2.8 Within the Prospectus it is noted that development on this scale allows a new settlement to exploit a number of opportunities and benefits, notably:

- Enabling opportunities for infrastructure that allows communities to be self-sufficient;
- Creation of vibrant mixed-use communities that support a range of local employment types, retail opportunities and recreational and community facilities;
- Delivering a wide range of high-quality and distinctive homes;
- Provision of integrated and accessible transport options that support economic prosperity and wellbeing for residents;
- Generous, accessible and good quality green infrastructure that can deliver environmental gains; and
- Ability to be designed to be resilient that allow for changing demographics, future growth and the impacts of climate change.