MATTER 2

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Planning & Development Consultants

Examination of the City of York Local Plan

Matters, Issues and Questions for the Examination

Matter 2 – The Housing Strategy

November 2019

CLIENT: KCS Development Ltd

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1.0 INTRODUCTION

1.1 This response has been prepared on behalf of KCS Development Ltd in relation to their continued land interest west of Chapelfield, Knapton, York on the western edge of the York urban area.

1.2 This response should be read alongside previous submissions made to the Local Plan, namely the July 2019 response to the City of York Local Plan Proposed Modifications and prior to that the submissions made to the Publication Draft Local Plan in March 2018. In addition to this statement relating to Examination Matter 2, it should be noted that a statement has also been prepared for Matter 3 on behalf of KCS Development Ltd.

2.0 TEST OF SOUNDNESS

2.1 The City of York Local Plan is being tested against the 2012 National Planning Policy Framework (NPPF 2012) which at Paragraph 182 states that:

> "The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."

3.0 RESPONSE TO INSPECTOR'S QUESTIONS

Matter 2 the housing strategy: the objectively assessed need for housing, the housing requirement and the spatial distribution of housing

The Housing Market Area (HMA)

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

a) Is that correct? If so:

3.1 It is understood that this is correct. The June 2016 SHMA explains the position in relation to the HMA, as repeated in the below extracts.

> 2.72 – "Because both Selby and York's strongest links are with each other it is reasonable to assess them together… We therefore consider the York HMA which includes Selby is a reasonable area."
>
> 2.103 – "The triangulation of the sources strongly supports placing each commissioning authority within a separate Housing Market Areas. Within this we would consider that the HMA which covers the City of York extends to include Selby."
>
> 2.106 "While we propose a HMA which links to Selby and York we are not considering housing need across the HMA. Selby has recently produced its own SHMA and this assessment does not seek to replicate it."

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

3.2 While we have no reason to believe otherwise, the Selby SHMA is no longer in play.

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

3.3 The justification is explained in the SHMA – see answer to Question 2.1 (a)

Q 2.2 Policy SS1 and Paragraph 3.3 of the Plan say that the objectively assessed housing need ('the OAHN') is 867 dwellings per annum (dpa) in the Plan Area for the plan period (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) 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). Is this correct? Is this a robust evidential basis?

3.4 Yes, this is correct. It is not considered that the further reduction of the housing requirement is based on robust evidence.

3.5 The Council's proposed modifications attempt to justify the reduction in the housing requirement from 867 dwellings in the Publication Draft to 790 dwellings based on the updated Housing Needs Update evidence published by G L Hearn in January 2019. It is considered the proposed modifications to reduce the housing requirement are unsound as they fail the 'positively prepared',' justified', and 'consistent with National Policy' soundness tests. We have significant concerns with the evidence update, which uses the 2016-based population projections, despite Government guidance requiring the continued use of the 2014-based projections, for reasons outlined below.

3.6 The ONS published 2016-based Sub-National Population Projections (SNPP) and Sub-National Household Projections (SNHP) have been used as the starting point by G L Hearn to generate a number of new potential housing need scenarios. We note and support the detailed HBF (July 2019) comments relating to the reasons behind the differences between the 2014-based and 2016-based SNPP and SNHP, and do not repeat them here.

3.7 The concerns with the 2016-based projections have been well documented, with the resultant reduction in the level of household growth across the Country causing concerns in how the Government will fulfil its aspiration to increase housing delivery to 300,000 dwellings per annum by the mid 2020's. The Government have been clear that for the purposes of calculating housing needs assessment under the new guidance in relation to the Standard Method, that the 2016-based projections are **not** to be used. This is now reflected in revisions to PPG, which at Paragraph 005 ID2a-005-20190220 state:

"the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes."

3.8 PPG goes on to state at Paragraph 015 Id 2a-015-20190220 that:

"Any method which relies on using the 2016-based household projections will not be considered to be following the standard method… it is not considered that these projections provide an appropriate basis for use in the standard method."

3.9 The revisions to PPG follow on from the Governments February 2019 response to the technical consultation on updates to NPPF and NPPG which stated:

"The changes to underlying assumptions in the population projections and methodological improvements to the household projections had led to significant variations in housing need at a local level, something that needs addressing in the short term… the Government continues to think that the 2016-based household projections should not be used as a reason to justify lower housing need. We understand respondents' concerns about not using the latest evidence, but for reasons set out in the consultation document we consider the consultation proposals to be the most appropriate approach in the short-term. We are specifying in planning guidance that using the 2016-based household projections will not be considered to be an exceptional circumstance that justifies identifying minimum need levels lower than those identified by the standard method."

3.10 We are aware that the Government guidance for the continued use of the 2014-based projections relates to the calculation using the standard method in the updated NPPF, which differs from the City of York Local Plan, which has been submitted and is being examined under the transitional arrangements and against the 2012 NPPF. The housing requirement in the York Local Plan has therefore been calculated using the Objectively Assessed Needs identified through a SHMA. That said, it would logically apply that the Government's concern with the 2016-based projections would also apply to Authorities calculating housing need under the transitional arrangements and OAN calculations.

3.11 The City of York is the only authority in the Yorkshire region whereby housing need calculated using the Standard Method results in an increased housing need compared with the current local assessment. The first Standard Method published on 14th September 2017 resulted in an

indicative annual requirement of 1,070 dwellings for the City of York which was more in line with the latest G L Hearn 2017 SHMA Update at the time (which was 953 dwellings per annum).

3.12 Calculating the Local Housing Need figure using the 2014-based household projections from the current year over a ten year period (2019 – 2029) and adjusting using the latest affordability ratio (published in March 2019), results in a requirement of **1,069** dwellings per annum. This remains the same as the original standard methodology figure of 1,070 dwellings per annum, and remains considerably higher than the Council's reduced figure of 790 dwellings per annum. It is clear from the latest Local Housing Need calculation that the direction of travel remains above 1,000 dwellings per annum, yet the Council are seeking to reduce the requirement.

3.13 The implications of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York (and to a lesser extent Selby), and will lead to the worsening of an already severe affordability situation. It is likely that the affordability ratio in York will continue to rise, particularly if there is pent up demand as a result of a restricted housing requirement. Based on the direction of travel, it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews.

3.14 We disagree with the Council's interpretation of the use of the 2016 based projections as stated in the Sustainability Appraisal Addendum (SAA). In justifying the reasons for selecting the 790 dpa figure and rejecting the alternatives, the SAA references the ONS SNPP 2016 based projections and references a 'marked discrepancy with the previous 2014 based figures' (SAA paragraph 5.3.40), which has had a significant bearing on the lower OAN in the GL Hearn Update of 790 dpa. There is however no reference to the Government's technical update or NPPG which proposes in the short term the continued use of the 2014 based data for calculating housing need via the Standard Method.

3.15 The SAA importantly states at paragraph 5.3.26 that:

> "Given the significant positive effects identified for the 2017 SHMA recommended alternative figure [953 dpa] against the SA objectives for housing, employment and equality of access (with a similar performance for the remaining objectives to the proposed preferred housing figure of 790 dpa and Publication Draft figure of 867 dpa), **the 2017 SHMA Update figure is considered to perform marginally better in sustainability terms than the proposed figure**." (our emphasis).

3.16 Clearly, the Council are willing to delay the progress of the Local Plan by consulting on Proposed Modifications to the submitted Publication Draft Local Plan which reduces the housing requirement. Arguably, it is considered that this delay allows the opportunity to re-visit the evidence in light of the updated NPPF and NPPG and look to amend the housing requirement and increase the requirement based on the latest calculation of Local Housing Need.

3.17 We are aware that Barton Wilmore and Lichfields are preparing alternative housing need calculations / evidence on behalf of a number of clients. Their work paints a picture of housing need in excess of 1,000 dwellings per annum and we are mindful both parties will be presenting their evidence at the EIP Hearing Session.

Recommendation:
In order to make the Local Plan sound, it is recommended that the Housing Requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation and in line with the Selby District Council approach.

Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.

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

3.18 No – The updated Detailed Housing Trajectory based on the 790 dpa OAHN is based on the housing need for the City of York only. The June 2016 SHMA (as referred to in answer to Question 2.1 a) explains the approach taken regarding the York HMA, concluding that the individual authorities are seeking to meet their own individual housing needs.

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

3.19 This question is for the Council to answer in relation to the responses received to the Submission Draft and later Proposed Modifications OAHN. However, in relation to the neighbouring authority of Selby District Council there is some disconnect between the approaches going forward, which is particularly relevant given the fact that Selby is identified as being within the York HMA. It is noted that Selby District Council's response to the Proposed Modifications (contained in EX/CYC/21a) does not make any reference to the differing approaches and reaffirms agreement of Selby and York to meet their own objectively assessed housing need within their own authority boundaries. The City of York have continued to pursue a OAHN based housing requirement under the transitional arrangments however Selby District Council have changed their approach and are pursuing a new Local Plan using the Standard Method of calculating Housing Need (this approach was approved by Council on 17th September 2019, which post dates the York Propopsed Modifications consultation). The Selby position has changed, since the York Local Plan submission. At the time of Submission, Selby were proposing a Sites and Policies Plan and a Local Plan Review. This is no longer the case, with Selby now preparing a new comprehensive Local Plan, which will be undertaken following the Governments Standard Method.

3.20 While we agree it is right for York to pursue their own housing target separate from Selby in the same housing market area we have concerns over the current disconnect between the two authority positions. The City of York Council latest position in the Submission Local Plan fails to recognise the change in Selby's position.

Q 2.3 What methodolical approach has been used to establish the OAHN, and does it follow the advice set out in the Planning Practic Guidance (under the heading 'Methodology: assessing housing need')? In particular:

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

b) Have market signlas been taken into account?

3.21 The Council have ignored advice in PPG in relation to the use of 2016 based Sub-National Household Projections when Government Guidance recommends the continued use of the 2014 based projections.

3.22 The Council ignored advice from GL Hearn in their SHMA Addendum to factor in a 10% market signals adjustment. The G L Hearn SHMA Addendum Update (May 2017) recommended a 10% market signals and affordable housing need uplift above the demographic housing need of 867 dwellings per annum, therefore resulting in an OAN of 953 dwellings per annum. The Council however chose not to accept the 10% uplift.

3.23 The G L Hearn Housing Needs Update (January 2019), having outlined the various Market Signals under the topic areas from the PPG "suggest an uplift in the region of 15% would seem reasonable." However, the uplift is applied to the demographic starting point (based on the significantly reduced 2016 projections) resulting in an OAN that is lower than the adjusted demographic growth and economic growth OAN, therefore the 15% adjustment has not been applied.

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

3.24 Policy SS1 refers to the need to provide sufficient land to accommodate an annual provision of around 650 new jobs. The explanatory text at paragraph 3.2 informs of technical work on economic growth carried out by Oxford Economic forecasting which suggests around 650 additional jots could be created in the City per annum over the period 2017 to 2038. The SHMA Addendum Update (May 2017) refers to the full SHMA economic growth forecasts, with Oxford Economics including bespoke forecasts procured by Arup of between 609 and 868 jobs per annum. It is not clear where the 650 jobs per annum originated from in Policy SS1. Prior to the Regulation 18 Pre-Publication Local Plan (September 2017) where the 650 jobs per annum was first introduced, the additional jobs figure in the Preferred Options Local Plan (June 2013) refered to approximately 16,000 additional jobs between 2012 and 2030 (equating to 888 jobs per annum).

3.25 The G L Hearn Housing Needs Update (January 2019) refers to the September 2017 Employment Land Review Update which formed the evidence base behind the September 2017 Pre-Publication Local Plan. As summarised in the Housing Needs Update, the ELR Update concludes that Scenario 2 is the most appropriate to take forward in the Local Plan. Scenario 2 is a locally led adjustment to the Oxford Econometrics baseline to reflect local cirumstances.

The total forecast jobs growth for Scenario 2 is 11,050 jobs over the plan period 2014 – 2031, equating to 650 jobs per annum.

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

3.26 The Council clearly consider that the OAHN does account for the expected additional jobs over the plan period. The Housing Needs Update concludes that the OAHN of 790 dwellings per annum is an economic-led housing need figure and refers to a number of modelling assumptions in relation to the expected jobs growth being met by the level of housing provision proposed. This includes the assumption that there will be no improvements to unemployment post 2017; that 3.3% of those working in York hold down more than one job; and that commuting ratios as set out in the 2011 Census stay constant.

3.27 There are however conflicting views, with the Lichfields work considering a minimum housing need above the Council's 790 dpa.The Lichfields critique of the Housing Needs Update considers that the demographic-led OAHN (before further uplifts are applied) for the City of York would equate to the long-term migration Scenario C1, which equates to 921 dpa. In relation to the employment led scenarios, the level of job growth projected by the ELR Scenario 2 (650 additional jobs per annum) can be accommodated within the 921 dpa demographic need (although Lichfields consider a case can be made to increase the figure still futher, to 1,062 dpa to match job growth based on past trends).

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

3.28 No, it is not considered that the OAHN figure is based on a robust methodology. We have raised concerns with the Council's methodology at the Submission stage, and in the later Proposed Modifications which proposed a revised OAHN, as referred to in answer to Question 2.2.

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

3.29 The Council consider in the Housing Needs Update that the affordable housing evidence suggests that a modest uplift to the demographic-based need figure to improve delivery of affordable hosuing in the City may be justified, and concludes a market signlas uplift of 15% would seem reasonable. However the applied uplift to the (reduced) demographic starting point (484 dpa) equates to 557 dpa which is less than the adjusted economic led demographic growth

of 790 dpa. The Council consider that the 790 dpa OAHN will sufficiently respond to market signals, including affordability adjustments and contributing to affordable housing needs.

3.30 We disagree with the Housing Needs update conclusions that 790 dpa is sufficient and remain concerned with the principal of using the 2016 based household projections as a starting point.

3.31 In simplistic terms, the identified affordable housing need in the City of York is 573 net affordable housing per annum. This figure has remained unchanged since the June 2016 SHMA. Even if every housing scheme provided 30% affordable housing (based on Draft Policy H10 greenfield sites above 15 dwelling threshold) then the housing requirement would need to be 1,910 per annum. It is clear on this basis alone that the housing requirement of 790 dpa is too low and will not meet the identified affordable housing need. A further uplift is required to meet affordable need.

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

3.32 See response to Question 2.3 b and c.

<u>The Housing Strategy: The Housing Requirement</u>

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

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

3.33 This is for the Council to clarify. It is not clear within the wording of Policy SS1 and further clarity is required.

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

3.34 Paragraph i of the Publication Draft in the 'About the Plan' section clearly states that:

> "This Local Plan covers the period from 2017 to 2032/33, with the exception of the Green Belt boundaries which will endure up to 2037/38."

3.35 Given the time lag between the Publication Draft (February 2018), Submission and delays in the commencement of the Examination due to the additional Proposed Modification consultation in summer 2019, the plan period upon Adoption (assumed to be sometime in 2020) will be just 13 years. This falls short of the 15 year time preference for Local Plans in the Framework (paragraph 157).

3.36 Given the Local Plan delay that has occured it is considered logical to extend the plan period to 2035 to ensure a 15 year plan period upon adoption (assuming adoption takes place in 2020), with the identification of at least 5 years worth of safeguarded land in the Plan for development beyond 2035 (or before 2035 if required) to ensure longer term permanence to Green Belt boundaries.

3.37 The identification of Safeguarded Land is considered particularly important as the Local Plan will set detailed Green Belt boundaries for the first time and an appropriate and sound strategy is therefore required to enable flexibility up to and beyond the plan period. We consider that Safeguarded Land is required in the City to provide a degree of permanence to the Green Belt boundary and avoid the need for future reviews. It would also provide flexibility and allow land to be brought forward quickly without a fundamental review of the whole Local Plan if allocated sites were unable to deliver the quantum of development envisaged. This is particularly important when considering the complex nature of some of the sites that are proposed for allocation in the Plan e.g. York Central and land to the West of Elvington Lane, as well as potential heritage issues with other sites across the City which may prevent the deliverability of some allocated sites coming forward as envisaged. Flexibility is therefore essential, with a contingency of sites required to not only provide a buffer of sites but in addition, respond to the fact that the housing requirement is a minimum target rather than a maximum figure.

3.38 Included within the Council's evidence base is Counsel opinion (EX/CYC/11a), which was sought by the Council in relation to the determination of the Green Belt boundary. This advise included the opinion that safeguarding land was appropriate in respect of land which is required to meet the longer term development needs of the area beyond the Plan period. John Hobson QC (Landmark Chambers) concluded that:

> "In my opinion if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the areas could be met, and in particular a failure to indicate how those longer term needs could be met without encroaching into the Green Belt and eroding its boundaries"

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

3.39 For the reasons set out in relation to 2.5 b, it is considered logical to extend the plan period to 2035 and incorporate safeguarded land in the Plan for at least a further 5 years beyond 2035.

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

3.40 Whilst we do not agree with the 867 or 790 housing figure it is our understanding that the Council have amended the housing requirement in the Local Plan (via the Proposed Modifications) to 790 dpa.

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?

3.41 Policy SS1 has been amended via the Proposed Modifications to set a housing requirement at 790 dpa based on the updated OAHN.

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

3.42 No – The SHMA affordable housing need (net) = 573 dwellings per annum. See answer to question 2.3 f.

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

3.43 As stated in answers to question 2.2 to 2.6 and in previous responses to the Publication Draft and Proposed Modifications, we do not consider the OAHN or revised OAHN is based on robust evidence and fails the positiviely prepared, justified and consistent with national policy soundness tests.

The Housing Strategy: Spatial Distribution

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

3.44 We do not consider the 5th spatial principle of Policy SS1 is appropriate, which states:

> "Where viable and deliverable, the re-use of previously developed land will be phased first."

3.45 One of the core planning principles of the Framework (2012) is the encouragement of the effective use of land by reusing previously developed land. The reference is to the encouragement of previously developed land, which we do not disagree with. However, in the context of York, there is not only a shortage of previously developed land, there is no proposed phasing of allocations, therefore this spatial principle to phase the release of previously developed sites first is unnecessary and does not align with other policies in the Local Plan.

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

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

3.46 There is no reference within Policy SS1 or the explanatory text to the overall housing requirement across the plan period, nor the distribution of housing. The Key Diagram only identifies strategic sites across the City, but does not identify any quantum of proposed development.

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

3.47 This Question is for the Council to answer. It is not clear within the Local Plan documentation what the distribution of development across the City is.

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

3.48 The TP1 Approach to defining Yorks Green Belt Addendum (March 2019) (EX/CYC/18a) refers to the Council's approach to the spatial distribution. It states at paragraph 5.35

> "The approach to the spatial distribution of growth and how to best meet the identified need for development within the plan is determined by the spatial strategy and the outcomes of the Preferred Options Local Plan (2013) and Sustainability Appraisal (2013). The spatial strategy identifies 'spatial shapers' which were established through the core strategy and include; historic character and setting, flood risk and green infrastructure as factors which shape growth by land which should be retained as open land.
>
> In addition to this, the preferred approach to spatial distribution of growth within the city evolved through consultation and the sustainability appraisals to be one which prioritised development within and/or as an extension to the urban area and through the provision of new settlements."

3.49 We have made previous comments in relation to the lack of understanding of the Council's distribution strategy and maintain that the spatial strategy for the City, and how this will be achieved over the lifetime of the Plan, should be set out clearly in the Plan.

3.50 Having reviewed the portfolio of sites set out in the Local Plan, it appears that the Council's strategy is a combination of urban expansion, the provision of isolated new settlements and restricted growth in existing settlements. The document contains no narrative as to how, or why, the Council has arrived at this approach, nor does it set out the implications of this pattern of spatial distribution or discuss the alternative options considered.

3.51 In sustainability terms, we still consider it more appropriate to focus growth in the York urban area and expand existing settlements. This approach would make best use of existing infrastructure and resources, as well as ensuring that the needs of the local community are met. In particular, the failure to allocate land in existing settlements will increase affordability pressures in the City.

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

3.52 This is unknown, and for the Council to answer. There is no background information that explains the proposed distribution of development across the City.

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

3.53 It is not considered that the Council's approach will lead to the most sustainable pattern of housing growth. Our concerns remain with the sustainability of ST15 at Elvington which is located in an isolated countryside location, with no existing infrastructure capable of accommodating the proposed levels of development.

3.54 It is considered that the Local Plan fails to make the best use of land within the Outer Ring Road and there is a missed opportunity of taking advantage of existing infrastructure. It is considered that an alternative and appropriate approach would be to fix the Outer Ring Road as the Green Belt boundary with fixed landscape corridors in between the inner and Outer Ring Road, which would allow the use of existing (yet not actually defined) Green Belt land contained within the outer boundary to be utilised for development.

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

3.55 This is for the Council to evidence, and will be discussed in detail in relation to Matter 3.

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

3.56 No, it is not fully justified (see answer to Question 2.9 c.). We believe there is a missed opportunity of identifying sustainable sites within the Outer Ring Road that can tap into existing infrastructure.