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1.0 INTRODUCTION & SITE HISTORY

- 1.1 We write on behalf of our client TW Fields to provide their hearing statement to Matters 1, 2 and 3 of the York Local Plan Examination in Public in respect of Land West of Wigginton Road (Site Ref. ST14.
- 1.2 TW Fields are one of two developers (along with Barratt Developments plc) promoting the delivery of the strategic site allocation Land to the West of Wigginton Road (Ref. ST14). The two developers are working in collaboration to promote the allocation of the site. This statement should be read alongside the Statement of Common Ground that has been prepared by the developers and the City of York Council (Council) in respect of this site.
- 1.3 Land to the West of Wigginton Road, referred to as the Clifton Gate Garden Village scheme, is identified as a Strategic Allocation in the submitted York Local Plan (ST14) to deliver a new sustainable Garden Village of a minimum of 1,348 new homes, alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, a health centre, affordable homes, elderly persons care homes, public open space and recreational facilities. This Garden Village approach fully supports the Government's ambitions for Garden Villages.
- 1.4 The identified Vision of the Clifton Gate site is to deliver: -

A new village with its own identity and good local facilities to meet the everyday needs of residents as the community grows over time. A new village which is well-connected to the centre of York and surrounding settlements by sustainable modes of transport but clearly separated and screened from existing settlements to avoid coalescence. A place that feels a part of York but is still a separate place.

- 1.5 The Clifton Gate site is strategically located to the north of York, beyond the established boundary of the Outer York Ring Road. The site is separated from the existing urban edge and surrounding villages. The site's location respects the historic and landscape character of this area of the City.
- 1.6 The development proposals are situated in a suitable and highly sustainable location in respect of connectivity to existing jobs and services at Clifton Moor. Importantly, there are no technical or environmental (built and natural) constraints that would preclude the development of the site.
- 1.7 The Clifton Gate site will make a significant contribution to meeting the City's objectively assessed housing needs over the emerging Local Plan period.
- 1.8 With regards to the guidance provided in Paragraph 182 of the NPPF (2012): -

- The Local Plan is positively prepared in respect of the delivery of 1,348 homes at the Clifton Gate site as the delivery of homes from the site will contribute significantly to meeting the evidenced objectively assessed development and infrastructure requirements of the City.
- The Local Plan is justified in respect of the Clifton Gate site as compelling evidence has been provided in this and previously submitted representations to demonstrate that the site's allocation is the most appropriate strategy for delivering a sustainable Garden Village of 1,348 homes in this location of the City, when considered against the reasonable alternatives, based on proportionate evidence;
- The Local Plan is **effective** as the proposed housing numbers at the Clifton Gate site are entirely deliverable within the plan period; &
- The Local Plan is consistent with national policy in respect of the Clifton Gate site as compelling evidence has been provided to demonstrate that the proposed development will deliver sustainable development within the plan period. Particular in respect of Paragraph 52 of the NPPF which identifies that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements that follow the principles of Garden Cities (or a Garden Village in this case).
- 1.9 The submitted Local Plan supports a development of 1,348 homes in this garden village. Whilst TW Fields supports the principle of this allocation, they consider that the defined boundary of the is unsound and support an expansion to the scheme, which they consider is viable and deliverable.
- 1.10 In making representations to the draft Local Plan the developers have presented three potential development options to the Council to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes. The final resolution of the precise boundary of the new settlement will be determined at the examination of the Local Plan.
- 1.11 A masterplan which aligns with the Council's current proposed boundary for the site and which delivers each of the policy aspirations required by Policy SS12 of the Local Plan is enclosed in Appendix A of this statement.
- 1.12 The enclosed masterplan identifies the following key elements: -
 - 1,350 homes to be delivered by 2033
 - Up to 405 Affordable Homes & Extra Care Facilities
 - 10.25ha of public open space, green corridors and recreational facilities as part of the development proposals. Including new playing pitch provision.
 - Provision of a Two Form Entry Primary School & School Playing Fields
 - Health Centre & Village Centre
 - Key views to York Minster will be preserved and accessible green corridors will be placed within them.

- The retention and enhancement of existing woodland, hedgerows and trees located within and surrounding the site. Providing landscape, visual and biodiversity enhancements.
- The provision of substantial levels of new landscape planting within and surrounding the site. Providing landscape, visual and biodiversity enhancements.
- Existing water features including ponds and streams will be incorporated into the development. New water features relating to a Sustainable Urban Drainage systems will also be delivered. These features will together form an integral aspect of the biodiversity benefits that the development can deliver. Equating to overall net biodiversity gain.
- New walking and cycling routes will be provided in the form of a new pedestrian/cycle
 underpass connection at the Clifton Moor Roundabout Access and a new pedestrian/cycle
 footpath connecting the site's access on Wigginton Road to the Outer Ring Road. These
 connections will also make the site accessible to the wider York footpath and cycle network.
- An existing public footpath connection between Clifton Moor and Skelton will be enhanced
 and made suitable for pedestrian/cycling connectivity. In doing so this will increase interactivity between the Clifton Gate settlement and Skelton so that the two settlements can
 share their services and facilities. This proposal would have the benefit of increasing the
 sustainability of the existing settlement of Skelton as well.
- Vehicular access to the site will be taken from the upgraded Clifton Moor roundabout, which will include a 4th access arm that solely serves the development site. A new access will also be provided from Wigginton Road to the east.
- 1.13 Works to the Clifton Moor Roundabout (which include the works needed to deliver the 4th arm and pedestrian/cycle underpass to connect Clifton Moor to the Clifton Gate site) are due to be commenced by the Council by Spring 2020. Planning permission is in place and the required level of funding has been secured. The works will strengthen the long-term defensible boundary to the south of the site, whilst delivering a key element of the site's infrastructure that will expedite the delivery of homes from the site in the early years of the Local Plan. A plan providing details of the works is enclosed in Appendix B.

SITE HISTORY

- 1.14 The site has been identified as strategic housing site allocation ST14 within different iterations of the City of York Local Plan and its accompanying Sustainability Appraisal since June 2013. At that time the Preferred Options Local Plan identified the site as having the potential to deliver 4,020 homes, along with the allocation of Safeguarded Land to the north of the allocation. The number of homes to be provided at the site was reduced to 2,800, along with an amendment to the red line site allocation boundary, within the now withdrawn City of York Publication Draft Local Plan (October 2014).
- 1.15 Prior to the withdrawal of the previous Publication Draft Local Plan (October 2014), the developers undertook and submitted a full package of technical assessments associated with the delivery of the previously proposed larger site allocation boundary associated with the

- delivery of 4,020 homes. This work was considered within the Council's Sustainability Appraisal at that time.
- 1.16 The Council published a new Local Plan Preferred Sites Document for consultation in July 2016.
 Within this version of the Local Plan the Clifton Gate site boundary was the same as proposed in the now submitted version of the Local Plan.
- 1.17 At that time the developers proposed two site options to the Council associated with the development of 1,348 homes (on a larger site area than proposed by the Council) and 1,725 homes. Each of the previously submitted technical assessments were updated at that time to reflect the developers two proposed options.
- 1.18 In response to the publication of the Pre-Publication Draft Local Plan (September 2017), the developers proposed a third alternative site option for 2,200 homes. This was on the basis of the site being able to deliver 2,200 within the period up to 2038 and in doing so providing permanence to the Green Belt in this area of the City.
- 1.19 The developers of the site have been promoting three alternative development options at the site in response to every publicised version of the Local Plan since September 2017. Including the Publication Draft Local Plan (February 2018) and the Proposed Modifications to the Local Plan (June 2019).

2.0 MATTER 1 - LEGAL MATTERS

DUTY TO CO-OPERATE

- 2.1 The development of the Clifton Gate scheme will play a key role in ensuring the Local Plan's Duty to Cooperate is upheld and delivered as it is a strategic housing site that can deliver a minimum of 1,348 market, affordable and specialist care homes within the Local Plan period. Delivering a substantial proportion of the City's identified housing needs up to 2033.
- 2.2 In particular it will have a direct impact on the following aspirations of the York Local Plan: -
 - Make a significant contribution to York meeting its own housing need (like the local development plans of its neighbours) without any undue pressure being placed on York's neighbours. At present a number of people/families are forced to leave the City to find available and affordable housing opportunities.
 - Delivering the strategic priorities in the Leeds City Region Strategic Economic Plan (SEP).
 - The delivery of homes from the site will contribute to reversing the trend of inward and outward commuting from the City.
 - The development proposals will release land required to deliver the Council's aspirations to dual the Outer York Ring Road.

STATEMENT OF COMMUNITY INVOLVEMENT

- 2.3 Extensive engagement on the principle and location of a village in this area of York has taken place since 2013 as part of the Local Plan. The Council has a comprehensive body of responses which have been taken into consideration when determining the overall portfolio of site allocations and the location for the proposed Clifton Gate garden village.
- 2.4 Land to the West of Wigginton Road was submitted as part of the 'call for sites' process and first included as a proposed site allocation in the Local Plan Preferred Options in 2013 which was subject to a comprehensive city wide consultation. Since then, the site has been subject to further city wide local plan consultation in 2014 (further sites), 2016 (preferred sites), 2017 (prepublication) and 2018 (publication).
- 2.5 All consultations have been carried out in compliance with the Council's adopted Statement of Community Involvement and have included extensive community engagement through a variety of consultation methods. The outcomes of these consultations is summarised in the Council's submitted Consultation Statement as part of the supporting evidence base to the Local Plan.
- 2.6 Furthermore, the developers have already undertaken consultation with local stakeholders including holding a weekend long workshop with the local community. The workshop was

attended by residents of Skelton, Clifton Moor, Wigginton and Haxby. The Parish Councils and Ward Members for each settlement were invited to attend the workshop as well. This work led to amendments to the scheme in order to respond positively to the comments received.

- 2.7 Letters of support for the Clifton Gate proposals have also been provided by Local MP's.
- 2.8 The Leeds City Region Enterprise Partnership has confirmed its full support for the Clifton Gate project, as they believe that it will make a positive contribution to meeting the housing growth ambitions of the Leeds City Region. The Clifton Gate development aligns with the emerging Leeds City Region Housing Vision including creating quality places and maximising infrastructure investment. The Clifton Gate proposals also form part of the City Region strategic sites pipeline.
- 2.9 With regards to other statutory bodies, the Council's Local Plan consultation has included working alongside statutory consultees including Heritage England, Highways England, Natural England and the Environment Agency. At the point of writing this statement there are no technical objections to the development proposals.
- 2.10 There is general acceptance across the City that the site represents a suitable option to meet the City's housing needs.

SUSTAINABILITY APPRAISAL

2.11 The Council has undertaken detailed Sustainability Appraisal work in respect of a number of different development site options for the Clifton Gate proposals ranging from 1,348 homes to 4,020 homes over a six year period. All of these options were considered to be sustainable.

HABITAT REGULATIONS ASSESSMENT

- 2.12 The Council's Habitat Regulations Assessment identifies that the Clifton Gate site is situated approximately 7km by road from the most convenient access point to the nearest European site, Strensall Common.
- 2.13 It further confirms that at such distances localised effects associated with the proximity of development (i.e. recreational pressure) are possible but avoided by the greenspace required as part of the allocation.
- 2.14 Furthermore, strategic issues, such as the disposal of wastewater are effectively screened out through adhering to the requirements of Local Plan Policy GI2 (vii). In particular, the Drainage Strategy for the development proposals will ensure that the water quality of the site and

surrounding area is not negatively affected through the provision of three phase Sustainable Urban Drainage Systems and the removal of silt and chemical inputs. A Construction Environment Management Plan will also be produced to demonstrate that construction run-off will be attenuated to prevent silt or diffuse pollutants entering the wider catchment area.

- 2.15 No other impacts are anticipated by the Council's Habitat Regulations Assessment.
- 2.16 The Strensall Common Visitor Survey identifies that the Clifton Gate proposals could generate a marginal increase in visitors to the Common. Though it must be stressed that this figure doesn't take into consideration any measures that would mitigate this. Specific measures that the site would deliver that will reduce the need and desire for future residents to visit Strensall Common to a negligible level include: -
 - A minimum of 10.25ha of public open space, green corridors and recreational facilities as part of the development proposals.
 - The retention and enhancement of existing woodland, hedgerows and trees located within and surrounding the site. Appropriate accessibility into these areas will be provided.
 - The provision of substantial levels of new landscape planting within and surrounding the site. Providing landscape, Appropriate accessibility into these areas will be provided.
 - New walking and cycling routes will be provided from the new settlement to Clifton Moor, also connecting the site to the wider York footpath and cycle network.
 - An existing public footpath connection between Clifton Moor and Skelton will be enhanced and made suitable for pedestrian/cycling connectivity.
- 2.17 The distance of the Clifton Gate site from Strensall Common; the provision of a substantial quantity of high quality on-site publicly accessible open space; and the provision of sustainable urban drainage systems will ensure that the Clifton Gate development has a negligible impact on Strensall Common, which is no greater than any other part of the City.

3.0 MATTER 2 - THE HOUSING STRATEGY

OBJECTIVELY ASSESSED HOUSING NEED & THE HOUSING REQUIREMENT

- 3.1 It is recognised that a continuation of the current undersupply of homes within the City would exacerbate housing affordability issues, increase unsustainable commuting patterns and adversely impact on the Council's desire of building a strong, competitive economy.
- 3.2 It is TW Fields' view that the Local Plan's objectively assessed housing need (OAN) of 790 homes per annum is not justified by compelling evidence on account of it not aligning with the methodological requirements established by national planning guidance. A more accurate representation of the OAN for the City would lead to an increase in the number of homes that the Local Plan should seek to deliver.
- 3.3 We believe that the OAN for the City should be in the region of 976 to 1069 homes per annum.
- 3.4 As part of the Proposed Modifications consultation (2019) a Housing Needs Update was produced by GL Hearn, date January 2019. The report was produced to consider the use of the 2016 subnational household projections (SNHP).
- 3.5 Originally the report was produced to support the Council's previous level of homes (867 per annum) and the decision of members to not include an affordability ration uplift, contrary to the recommendations of the report and officers. Notwithstanding the purpose of the report, it is now noted that the Council are seeking to reduce their OAN to 790 homes per annum, with this update forming the principle piece of evidence.
- 3.6 It is noted that using the 2014 household projections shows a starting point of 849 dwellings per annum, with a 15% affordability uplift resulting in an OAN of 976 dwellings per annum. This calculation is exactly the same as the approach advocated in the update report, however it uses the 2014 projections rather than the 2016 projections.
- 3.7 We consider that the 2014-based MHCLG household projections should take preference to the 2016-based ONS household projections following the Government's technical consultation in respect of the 2018 NPPF's Standard Method, and the subsequent confirmation in the PPG that 2016-based ONS household projections should not be used for the purpose of calculating Standard Method.
- 3.8 It is considered that the 2014-based household projection for York should represent the demographic starting point of housing need. This shows need for 849 dwellings per annum

- (dpa) once the Council's vacancy rate assumption has been applied. The Council's 15% market signals uplift should be applied to this figure, resulting in OAN of 976 dpa.
- 3.9 However, the market signals uplift should also be considered in the context of the 30% market signals uplift applied under Standard Method, which results in overall need of 1,069 dpa.
- 3.10 Given that the evidence does not support the level of homes that the Local Plan is seeking to deliver, the Local Plan's housing requirement is therefore considered to be unsound. In order to make the plan sound, the housing figure should be adjusted upwards to reflect a robust assessment of the OAN.
- 3.11 The evidence maintains our previously presented case for the expansion of the Clifton Gate site to deliver at least 1,725 homes in order to meet the City's full objectively assessed housing needs.
- 3.12 It is a fact that the City's housing needs cannot be met through the release of previously developed sites or through a combination of smaller sites located adjacent to the Main Urban Area or the City's existing surrounding satellite Villages, whilst also respecting each of the City's principle characteristics.
- 3.13 The Local Plan identifies the Clifton Gate garden village as a Strategic site that will make a significant contribution to meeting the housing needs of the City across the lifetime of the plan. The site has passed the Council's site selection methodology based on the spatial strategy and presents an opportunity for a high quality development that responds to the city's needs and special qualities.

THE PLAN PERIOD

- 3.14 Paragraph 157 of the NPPF identifies that Local Plans should be drawn over an appropriate timescale and "preferably a 15-year time horizon". Given that the role of the Local Plan will also be to define the boundaries of the York Green Belt for the first time, we believe that the plan period should be 15 years post adoption as an absolute minimum.
- 3.15 Accordingly, we believe that the Local Plan's proposed plan period should be increased to at least 2035 to enable a 15-year time horizon from a proposed adoption date of 2020.
- 3.16 With regards to Green Belt permanence, Paragraph 85 of the NPPF identifies that where necessary LPA's need to plan for longer term development needs "stretching well beyond the plan period" through the potential designation of Safeguarded Land. There are varying examples within recently approved Development Plan documents of what a timescale of "well"

beyond the plan period' can equate to which differ between an additional 5 years' worth of land or in some cases 10 years' worth of land. The greater the length beyond the plan period, the greater permanence can be provided to the Green Belt.

- 3.17 TW Fields supports the Local Plan's intentions to allocate sufficient housing land for the City for up to five years beyond the plan period given that the Local Plan will be defining the City's Green Belt boundaries for the first time. Such an approach will provide long-term permanence to the Green Belt, but importantly it will also provide the development industry and the local community with certainty.
- 3.18 The Clifton Gate scheme will deliver a minimum of 1,348 homes by 2033. As a result there is the potential to increase the number of homes that the site can deliver by 2040, should the Local Plan period be increased to 2035 through the examination process.

SPATIAL DISTRIBUTION

- 3.19 The spatial strategy in the Local Plan identifies housing and employment growth as the key drivers for development in the city and sets a framework for where development should be located based on protecting the city's unique heritage and environmental assets, avoiding areas of high flood risk and ensuring development is located where it is accessible by sustainable transport modes and to services and facilities.
- 3.20 One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre. See Figure 3.1 of the Local Plan. The Outer Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond.
- 3.21 The allocation of new Garden Villages such as the Clifton Gate site reflects the historic development pattern of the City and in doing so ensures that the historic and landscape character of this area of the City is preserved and enhanced where possible.
- 3.22 The allocation of the Clifton Gate site is entirely in accordance with the spatial principles identified within Policy SS1 of the Local Plan as follows: -
 - The size, scale and location of the Clifton Gate respects the historic development patterns of the City, conserving and enhancing York's historic and natural environment.

- Clifton Gate will be a self-sustaining new settlement providing daily services and facilities
 within walking and cycling distance and new sustainable transport connections within the
 site and to the surrounding settlement areas will also be provided.
- The development will help to prevent unacceptable levels of congestion, pollution and/or air quality through the delivery of new homes that will reduce unsustainable commuting patterns; through the provision of a self-sustaining new settlement; and through the provision of new sustainable transport connections within the site and to surrounding settlement areas.
- The site is located entirely within Flood Risk Zone 1 and a robust drainage strategy will be delivered to ensure that flood risk is appropriately managed.
- Whilst the re-use of previously developed land will be supported by the Local Plan, it is a
 fact that the City's housing needs cannot be met through the release of previously
 developed sites or through a combination of smaller sites located adjacent to the Main
 Urban Area or the City's existing surrounding satellite Villages, whilst also respecting each
 of the City's principle characteristics.
- 3.23 The principle of the allocation of the Clifton Gate site meets the tests identified in Paragraph 182 of the NPPF as it is positively prepared, justified, effective and consistent with national policy.

4.0 MATTER 3 - GREEN BELT

GENERAL PRINCIPLES

- 4.1 Whether the Inspector considers that the Local Plan should be establishing the York Green Belt for the first time or whether it should define the inner/outer boundaries of the established general extent of York Green Belt (as defined by the Yorkshire & Humber Regional Spatial Strategy), the Clifton Gate site does not serve any of the five Green Belt purposes and there are exceptional circumstances to warrant the allocation of the site (with or without revised boundaries) in the Local Plan.
- 4.2 As identified in Section 1 of this statement, the allocation of the Clifton Gate site meets the tests identified in Paragraph 182 of the NPPF (2012) as it is positively prepared, justified, effective and consistent with national policy.
- 4.3 To ensure a continuous supply of housing opportunities throughout the Local Plan period the Local Plan identifies a range of housing sites to meet the housing needs of the current population and the future population linked to the city's economic growth ambitions. This includes the identification of 'garden village' developments delivering exemplar new sustainable communities which will conserve the historic character and setting of the City.
- 4.4 The Local Plan identifies the City of York's six principle characteristics as being: -
 - a strong urban form and townscape, with the layout of streets and square, building plots, arterial routes, village greens and Burbage plots informing the village structure;
 - · compactness and accessibility;
 - incorporation of views onto landmark monuments;
 - rich diversity of architectural character;
 - understanding of archaeological and historic nature of the site; and
 - retaining the city's landscape and setting within the rural hinterland, including the city's incorporation of open green strays, river corridors and lngs which penetrate the urban form and break up the city's built form.
- 4.5 The identification of the Clifton Gate Garden Village reflects these characteristics, enabling a new settlement with its own identity to be created. It will be a well-designed to reflect the existing settlement form of villages around the main urban area of York, in-keeping with the existing urban form and York's unique character.

- 4.6 One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre. See Figure 3.1 of the Local Plan.
- 4.7 The Outer York Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond.
- 4.8 The allocation of new Garden Villages such as the Clifton Gate site reflects the historic development pattern of the City and in doing so ensures that the historic and landscape character of this area of the City is preserved and enhanced where possible.
- 4.9 Whilst the Clifton Gate development is a free-standing garden community, it is well-connected to the centre of York and surrounding settlements by sustainable modes of transport. The development proposals include a number of infrastructure proposals which are focused around making the development as sustainable as possible as early as possible. The development proposals will deliver infrastructure allowing accessibility from the site for pedestrians and cyclists to the number of services and facilities located within 1km of the site. Including Clifton Moor, Skelton and the City's cycle and footpath network.
- 4.10 The Council's Local Plan consultation has included working alongside statutory consultees including Heritage England, Highways England, Natural England and the Environment Agency. There are no technical objections to the development proposals and there is general acceptance across the City that the site represents a suitable option to meet the City's housing needs.

EXCEPTIONAL CIRCUMSTANCES

- 4.11 The Spatial Strategy in the Local Plan identifies housing and employment growth as the key drivers for development in the City and sets a framework for where development should be located based on protecting the City's unique heritage and environmental assets, avoiding areas of high flood risk and ensuring development is located where it is accessible by sustainable transport modes and to services and facilities.
- 4.12 It is recognised that a continuation of the current undersupply of homes within the City would exacerbate housing affordability issues, increase unsustainable commuting patterns and adversely impact on the Council's desire of building a strong, competitive economy.

- 4.13 The Local Plan identifies the Clifton Gate garden village as a Strategic site that will make a significant contribution to meeting the housing needs of the City across the lifetime of the Plan. The site has passed the Council's site selection methodology based on the spatial strategy and presents an opportunity for a high quality development that responds to the city's needs and special qualities. The site is strategically located to the north of the City, but importantly separated from the existing urban edge and surrounding villages to ensure that the historic and landscape character of this area of the City is preserved and enhanced where possible.
- 4.14 The Council's Green Belt Topic Paper (Addendum 2019) identifies that over the full planning period 2038, that there is a requirement to find sufficient land to provide for 17,102 dwellings.
- 4.15 It is a fact that the City's housing needs cannot be met through the release of previously developed sites or through a combination of smaller sites located adjacent to the Main Urban Area or the City's existing surrounding satellite Villages, whilst also respecting each of the City's six principle characteristics.
- 4.16 With specific regards to affordability and specialist housing needs, York's Strategic Housing Market Assessment (SHMA, 2016 and update, 2017) and Housing Need Update (2019) indicates that there has been some increase in affordability pressures over the long term in York which when benchmarked against the Regional and National picture the affordability pressures are more severe. Other key housing issues identified in the Council's evidence base include: -
 - Across all areas the affordability of property has worsened quite markedly over the past 15 years.
 - The gap of house price growth between York and the surrounding North Yorkshire county has widened from 10 years ago.
 - York is becoming increasingly more unaffordable and that a market signals adjustment in the City is necessitated.
 - There is a net affordable housing need of 573 dwellings per annum in the period from 2012 to 2032 (based on a 30% affordability threshold).
 - There is an acute need for the provision of new affordable housing in the City.
 - Over the 2012-2033 period there is an identified need for 84 specialist units of accommodation for older people (generally considered to be sheltered or extra-care housing) per annum.
 - There is also a potential need for an additional 37 bedspaces per annum for older people (aged 75 and over) in the 2012- 2033 period for nursing and residential care homes.
- 4.17 The Clifton Gate site will deliver a variety of type, tenure and mix of homes in accordance with the specific housing needs identified in the Council's SHMA.
- 4.18 The development proposals will deliver a minimum of 1,348 homes within the plan period, 30% of which (405 homes) will be delivered as affordable housing. It is also anticipated that

- approximately 80 homes (market and affordable homes) will be delivered to meet the needs of specialist housing, including extra care accommodation.
- 4.19 The release of the Clifton Gate site will make a significant contribution to meeting the City's objectively assessed housing needs. Should it be determined through the Examination process that the housing requirements of the Local Plan are required to be increased, the Clifton Gate proposals could be expanded as proposed by the developers to contribute to meeting this need without the need to revisit the discussion on Green Belt exceptional circumstances.
- 4.20 The City's housing needs could not be met without the release of the Clifton Gate site on account of the following: -
 - There are insufficient previously developed land opportunities available within the City to meet its objectively assessed housing needs.
 - Alternative site options could not match the total quantum and pace of delivery of homes within the plan period.
 - Alternative site options would not meet each of the City's six principle characteristics.
- 4.21 The above factors combine to create a compelling case for exceptional circumstances for the allocation of the Clifton Gate site within the York Local Plan.

DEFINING THE SITE BOUNDARY

- 4.22 As identified above, one of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The Clifton Gate site aligns with one of these development corridors which extends radially outwards northwest of York City Centre as shown on Figure 3.1 of the Local Plan.
- 4.23 The Outer York Ring Road currently demarcates the urban area of York from the surrounding Green Belt countryside. Where settlements are close to this road, there is a separation distance ranging between 60m and 400m. This has the appearance of reinforcing the village character which is distinct from suburban York. This can be seen in the relationship of villages such as Poppleton, Earswick and Haxby with the ring road and the city beyond.
- 4.24 The Clifton Gate development would follow this general principle. Through setting new development back from the Outer York Ring Road as proposed it would establish a village character, provide a distinct identity of the development, and reinforce the City's historical character of development through providing separation from the edge of the City.
- 4.25 The built edge of the new village will be 1 kilometre from Skelton and will also be well screened from the east by existing mature woodland and set away from Wigginton Road; preserving the rural character of the route into the city centre.

- 4.26 Screening is provided by existing plantations to the east and mature hedgerows adjacent to Burtree Dam to the west of the site, with proposed planting further restricting views into the site.

 The extent of screening landscape elements will result in distant glimpsed views into the new village centre from Wigginton Road, minimising visual impact on adjacent green corridors.
- 4.27 Existing fragmented woodland will be linked and strengthened with new tree planting, green spaces and sports pitches. A series of linked green spaces will encircle the village, providing recreation for the new community and ensuring a green buffer from Clifton Moor and a low density edge from the surrounding countryside. Sport pitches and school playing fields will be located on the site's western boundary, to deliver active uses adjacent to the wider open countryside.
- 4.28 Existing water features including ponds and streams will be incorporated into the new village layout. New water features relating to a Sustainable Urban Drainage systems will also be delivered. These features will together form an integral aspect of the new streets and open spaces adding character and drawing on precedents from surrounding villages.
- 4.29 Linear green spaces will run through the residential area and incorporate watercourses and existing hedgerows. These linking green spaces will create a network of pedestrian routes through the site and define individual neighbourhoods within the new development. They will accommodate a range of community and recreational facilities such as play areas and allotments. Importantly, the green corridors which run through the site have been positioned in order to preserve views of York Minster.
- 4.30 The development proposals can deliver an exemplary new Garden Village which respects the historic character of the City. It can deliver new homes alongside significant areas of community and green infrastructure, in a sustainable location within proximity of the City's existing urban edge. It will be separated and screened from existing settlements to avoid coalescence, but though a separate place, it will still very much feel a part of York.

GREEN BELT PURPOSES

4.31 The Clifton Gate site does not fulfil any of the five Green Belt purposes for the following reasons:-

• The development of the site would not result in unrestricted urban sprawl

The development will deliver a landscape character led new garden village that enhances existing and delivers new strong defensible landscape and greenspace boundaries.

The new development will be set back from the outer Ring Road to establish a village character, provide a distinct identity of the development, and reinforce the separation from

the edge of York in keeping with the City's historical development pattern. The Outer Ring Road provides the long-term defensible boundary to the south of the site ensuring no unrestricted urban sprawl.

Works to the Clifton Moor Roundabout (which include the works needed to deliver the 4th arm and pedestrian/cycle underpass to connect Clifton Moor to the Clifton Gate site) are due to be commenced by Spring 2020. Planning permission is in place and the required level of funding has been secured. The works will strengthen the long-term defensible boundary to the south of the site, whilst delivering a key element of the site's infrastructure that will expedite the delivery of homes from the site in the early years of the Local Plan.

Existing fragmented woodland on the western edge of the site will be linked and strengthened with new tree planting, green spaces and sports pitches.

Screening is provided by existing woodland plantations to the east, with further proposed planting further restricting views into the site. The extent of screening landscape elements will result in minimal visual impact on adjacent green corridors.

Existing hedgerow boundaries and tree planting located on the site's northern boundaries will be strengthened to deliver long-term defensible boundaries.

The development proposals reflect the existing settlement form of the villages around the main urban area of York in-keeping with the existing urban form and York's unique character.

• The development of the site would not result in the merging of adjacent settlements

The scale of development proposed reflects the site's location relative to Clifton Moor, Skelton and Haxby, an element identified as being characteristic of the City.

The positioning of open space on the western boundary; substantial landscaping on all of the site's boundaries; and retention of existing woodland areas ensures the delivery of permanent future boundaries to the site.

The development would not visually close the gaps between the site and its closest settlements any more than present, a clear open gap (with intervening tree cover) would exist between the site and the surrounding settlements and the proposed development of the site would offer additional screening and would therefore serve to increase the perception of the gap between it and the surrounding settlements.

The development proposals reflect the existing settlement form of the villages around the main urban area of York in-keeping with the existing urban form and York's unique character.

The site does not assist in safeguarding the countryside from encroachment

No part of the site is defined by the City of York Council as forming part of an area of Nature Conservation Interest or an Area of Special Landscape, Character or Setting and the landscape character of the site can be considered to be transitional urban fringe land. As a consequence, the site relates more to the urban edge to which it is adjoined rather than the open countryside, which means that it does not correctly serve a purpose of reducing encroachment. The site also benefits from a number of existing strong defensible boundaries, each of which will be strengthened through the development proposals.

The site does not perform an important role in safeguarding the countryside from encroachment. The site's existing boundaries form a limit to development and the development of the site has the potential to strengthen the site's existing boundaries and also improve access to the countryside.

 The proposed development of the site will have no detrimental effect on the setting and special character of historic features

The allocation of the Clifton Gate garden village respects each of the City's six principle characteristics. It will be a well-designed to reflect the existing settlement form of villages around the main urban area of York in-keeping with the existing urban form and York's unique character.

One of the key characteristics of York is how the city developed out from its historic core in the form of radial corridors separated by a series of green fingers. The proposed site aligns with one of these development corridors which extends radially outwards north-west of York City Centre. See Figure 3.1 of the Local Plan. The Clifton Gate site sits between two green fingers, consisting of the Ouse Corridor to the west of the site, and Bootham Stray to the east. These green fingers positively contribute towards York's green infrastructure network, enhancing the amenity and biodiversity value of existing routes into the city centre and links nature conservation sites with other open space. They also preserve the notion of approaching the city through the countryside.

An assessment has also been undertaken of the historic setting of York Minster and the masterplan has been designed to preserve and where possible enhance the heritage assets within proximity of the site. Importantly, the proposed green corridors which run through the site have been positioned in order to preserve views of York Minster.

 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

It is a fact that the City's housing needs cannot be met through the release of previously developed sites or through a combination of smaller sites located adjacent to the Main Urban Area or the City's existing surrounding satellite Villages, whilst also respecting each of the City's six principle characteristics.

4.32 The Clifton Gate site does not serve any of the five purposes of Green Belt. Furthermore, the enclosed nature of the Clifton Gate site means that the long-term openness and permanence of the surrounding Green Belt area would be provided.

OPENNESS OF THE GREEN BELT

- 4.33 For completeness, we have undertaken an assessment of the impact of the Clifton Gate development on the openness of the wider York Green Belt. We have undertaken this assessment on the basis that the Inspector agrees with the Council's position that the general extent of the York Green Belt is established and that the Local Plan is seeking to define the inner/outer boundaries for the first time. The assessment has taken into account the conclusions of the appraisal of the site against the five purposes of Green Belt provided in Paragraph 4.31 above.
- 4.34 The development proposals will have a minor spatial and visual impact on the openness of the York Green Belt. This is solely by virtue of the volume of the proposals and nature of the development taking place. Any impacts associated with the degree of activity likely to be generated, such as traffic, can be mitigated appropriately. Evidence of this has been provided

by the Council and Developer previously. This evidence will of course be discussed as part of Phase 2 of the Examination process.

- 4.35 Notwithstanding the above, there are unequivocal exceptional circumstances that warrant the allocation of the site and the developers are also committed to delivering compensatory improvements that would offset any minor impact. These improvements include: -
 - A minimum of 10.25ha of public open space, green corridors and recreational facilities as part of the development proposals. Including new playing pitch provision.
 - The retention and enhancement of existing woodland, hedgerows and trees located within and surrounding the site. Providing landscape, visual and biodiversity enhancements.
 - The provision of substantial levels of new landscape planting within and surrounding the site. Providing landscape, visual and biodiversity enhancements.
 - Existing water features including ponds and streams will be incorporated into the development. New water features relating to a Sustainable Urban Drainage systems will also be delivered. These features will together form an integral aspect of the biodiversity benefits that the development can deliver. Equating to overall net biodiversity gain.
 - New walking and cycling routes will be provided in the form of a new pedestrian/cycle
 underpass connection at the Clifton Moor Roundabout Access and a new pedestrian/cycle
 footpath connecting the site's access on Wigginton Road to the Outer Ring Road. These
 connections will also make the site accessible to the wider York footpath and cycle network.
 - An existing public footpath connection between Clifton Moor and Skelton will be enhanced
 and made suitable for pedestrian/cycling connectivity. In doing so this will increase interactivity between the Clifton Gate settlement and Skelton so that the two settlements can
 share their services and facilities. This proposal would have the benefit of increasing the
 sustainability of the existing settlement of Skelton as well.
 - The developers of the site will also seek to work alongside *Treemendous York* to aid their objective of planting 50,000 new trees within the City in order to promote a healthier, greener, more environmentally friendly, successful and beautiful city.
- 4.36 It is considered that the compensatory improvements that the Clifton Gate development will deliver go beyond those needed to mitigate the minor immediate impacts of the proposals.

5.0 ALTERNATIVE DEVELOPMENT OPTIONS

- 5.1 Whilst TW Fields support the identification of the Clifton Gate site as a new Garden Village within the emerging City of York Local Plan, they have concerns with the size of the current site allocation boundary.
- 5.2 Whilst the site can deliver 1,348 homes within the plan period within CYC's proposed site allocation boundary, TW Fields remain of the view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS12 of the Local Plan.
- 5.3 Furthermore, should it be determined through the Examination process that the housing requirements of the Local Plan are required to be increased, the Clifton Gate proposals could be expanded as proposed by the developers to contribute to meeting this need.
- 5.4 The developers have previously presented three potential development options to the Council to provide a new Garden Village of either 1,350 homes; 1,725 homes; or 2,200 homes alongside the delivery of significant community infrastructure in the form of a new primary school, a village centre, public open space and recreational facilities.
- None of the proposed options presented by the developers for the Clifton Gate site are located within the *York Green Belt Appraisal Character Areas* as set out in Figure 3.1 of the Local Plan.
- 5.6 The expanded land area required to deliver each of the developers proposed options does not fulfil Green Belt purposes.
- 5.7 Each of the developers proposed options would deliver a proportional uplift in the socioeconomic benefits that could be delivered to the City.
- 5.8 Each of the developers proposed options would also deliver a proportional uplift in the compensatory improvements that would off-set any impact that they would have on the openness of the wider retained Green Belt.
- 5.9 The net developable residential area of each of the proposed options are similar in size to the current allocation site area identified within the Local Plan. The expansion of the site required to deliver each of the proposed options would not require a significant amount of further land to be released from the Green Belt when considered against the wider extent of the proposed boundaries of the York Green Belt.

5.10 With regards to the developer's proposed which recommends the delivery of 1,725 homes at the site, the Council's Officers previously endorsed an increase in the proposed site allocation from 55ha (1,348 homes) to 68ha (1,672 homes) to the Council's Local Plan Working Group on the 10th July 2017. The reasoning behind the recommendation was as follows: -

"This reflects developers/landowners concerns regarding the viability/deliverability of the site and the ability to deliver the planning principles including the significant infrastructure requirements given the sites location adjacent to the A1237."

- 5.11 This option was also put forward by the Council's Officers as a potential change to the Local Plan ahead of consultation in respect of the Publication Draft Local Plan at CYC's Local Plan Working Group on the 23rd January 2018.
- 5.12 Whilst the recommendations of Officers were not approved on either occasion, the developer believes that there is still a strong case for the expansion of the site to deliver each of the aspirations of Policy SS12 of the Local Plan and to meet an expected increase in the City's housing numbers.
- 5.13 The potential expansion of the site will be discussed further as part of the Phase 2 hearing sessions, but TW Fields wanted to bring it to the attention of the Inspector within this statement.
- 5.14 The developers have previously provided an assessment of each of their development options against the site specific policy parameters identified within Local Plan Policy SS12. This assessment is enclosed in Appendix C of this statement.
- 5.15 The following plans are also enclosed in Appendix D of this statement which provide further details with respect of each of the developers proposed options: -
 - 1.725 Home Illustrative Masterplan August 2016
 - 1,350 Home Land Use Plan & Key August 2016
 - 1,725 Home Land Use Plan & Key August 2016
 - 2,200 Home Land Use Plan & Key October 2017

APPENDIX A

Masterplan & Land Use Plan – Current Local Plan Boundary





KEYS Constraints

Site boundary

— — - Contour lines

Existing steams or ponds

Existing woodlands surrounding the site (outline representing canopy)

Existing woodlands within the site (outline representing canopy)

Designated woodlands - SINC (Site of Importance for Nature Conservation)

30m buffer to historic woodlands

Existing Category A trees
To be Retained (RPA shown with a circle)

Existing Category B trees
May or May not be Retained
(RPA shown with a circle)

Existing Category C trees
 May or may not be retained- TBC
 (RPA shown with a circle)

Existing dead/dying trees
To be removed

Existing hedgerows
Could be removed - TBC

Existing important hedgerow corridors (8m)
To be retained

Areas of potential archaelogical interest

Emergency Water main with 7.5 m wide easement on each side

Overhead electric services

Existing buildings

Existing A roads (Key vehicular routes)

Existing B roads

Other important vehicular routes

Potential vehicular access into site

Potential pedestrain access into site

Existing PROWs (Public Rights of Way) and bridleways

Existing Key view corridors

Land use

Residential

Primary school-building site

Primary school-playing fields

Mixed-use

Open space with play areas

Outdoor Sports

Allotments

Other green/open space

Primary vehicular route

Proposed structural woodland

Proposed cycle and footbridge [Indictive location]

Indictive SUDS location

Proposed trees [Indictive]

Land to the north of Clifton Moor York
Land Use Plan

Keys

for TW Fields Ltd Barratt Homes & David Wilson Homes

Drawing No. 00855_SK_ Scale @ A4 Rev



APPENDIX B Clifton Moor Upgraded Roundabout Plans



APPENDIX C

Developers Assessment of Site Options Against Policy SS12



Ref.	CYC	BDW/TWF Option 1	BDW/TWF Option 2	BDW/TWF Option 3
1. Site Size	55Ha	65.36Ha	77.56Ha	101.53Ha
2. Site Capacity	1,348 Homes (1,200 Plan Period)	1,350 Homes (All within the plan period)	1,725 Homes (All within the plan period)	2,200 Homes (Potential for up to 2,200 homes within the plan period)
3. Density	Strategic Site – 70% net site area at 35dph	Garden Village – Approximately 60% to 70% net developable area – 42.32Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 53.92Ha net site area at 32dph	Garden Village – Approximately 60% to 70% net developable area - 67.92Ha net site area at 32dph
		CYC	Planning Parameters	
4(i)	Garden Village	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.	Approximately 60% to 70% net developable area at 32dph will ensure the delivery of a Garden Village.
4(ii)	Sustainable Housing Mix	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing.	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing. The site can also help to deliver additional homes should CYC's annual housing requirement increase.	Site can deliver a variety of housing needs including first time buyers, detached family homes, homes for senior citizens, build for rent and affordable housing. The site can also help to deliver additional homes should CYC's annual housing requirement increase.
4(iii)	Local Centre	2.3Ha of land for a Local Centre	2.3Ha of land for a Local Centre	2.3Ha of land for a Local Centre
4(iv)	Nursery/Primary Education	2.26Ha of land provided for Nursery and a two-form entry Primary Education.	2.26rla of land provided for Nursery and a two-form entry Primary Education.	2.26Ha of land provided for Nursery and a three-form entry Primary Education.
4(v)	Education Contributions	Appropriate contributions will be delivered for secondary education.	Appropriate contributions will be delivered for secondary education.	Appropriate contributions will be delivered for secondary education.
4(vi)	New Access Roads East & South	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane.	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane	Two access points are proposed from Wigginton Road (east) and from the existing roundabout junction at Clifton Moor (south). For the avoidance of any doubt, no access is being proposed from the Wigginton Road/A1237 roundabout. For the avoidance of any doubt, there will be no access/egress from Moor Lane



Adviii) Individual & Cumulative Cumulative Cumulative Variansport Impact Impact Impact Impact Impact Impact Impa					0
Transport Impact	4(vii)	Individual &			
Impact Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals.		Cumulative			
Detailed discussions have already taken place with CYC to agree the site-specific access solutions for the development proposals. 4(viii) Local Highways Upgrades Up		Transport	to ensure that the individual and cumulative	ensure that the individual and cumulative	to ensure that the individual and cumulative
Public Transport Services		Impact	highways impact on the City is mitigated.	highways impact on the City is mitigated.	highways impact on the City is mitigated.
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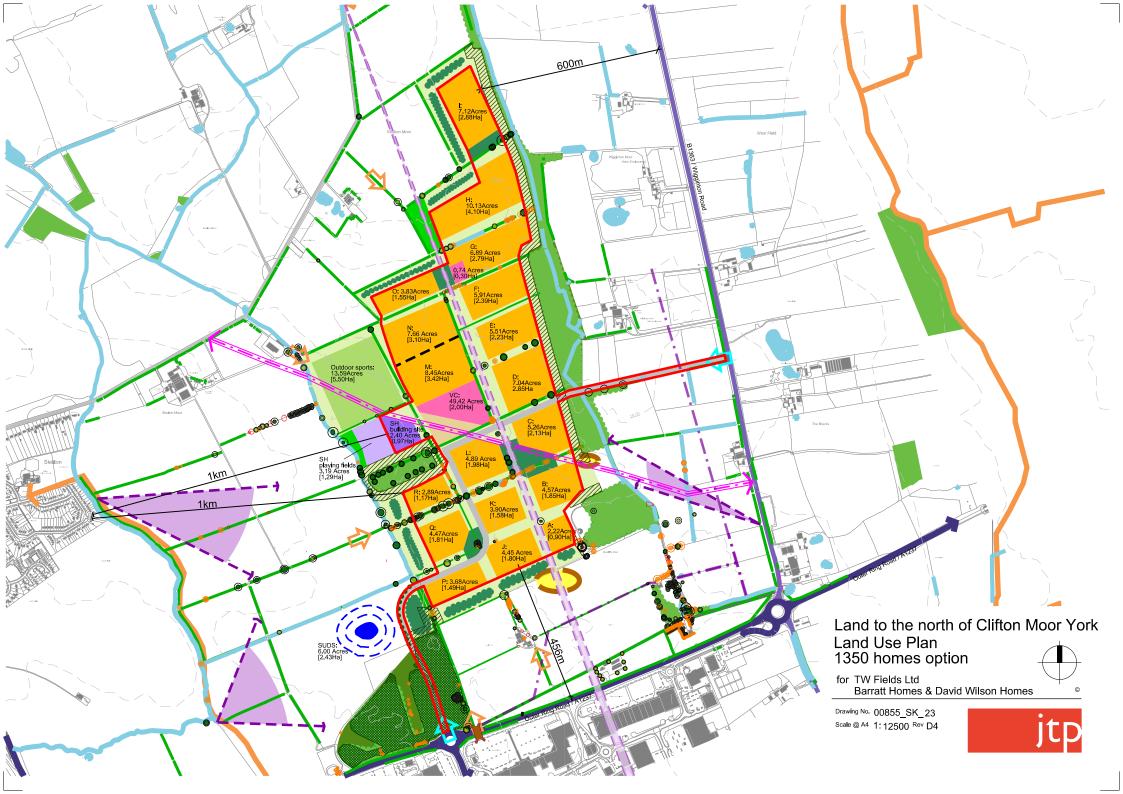


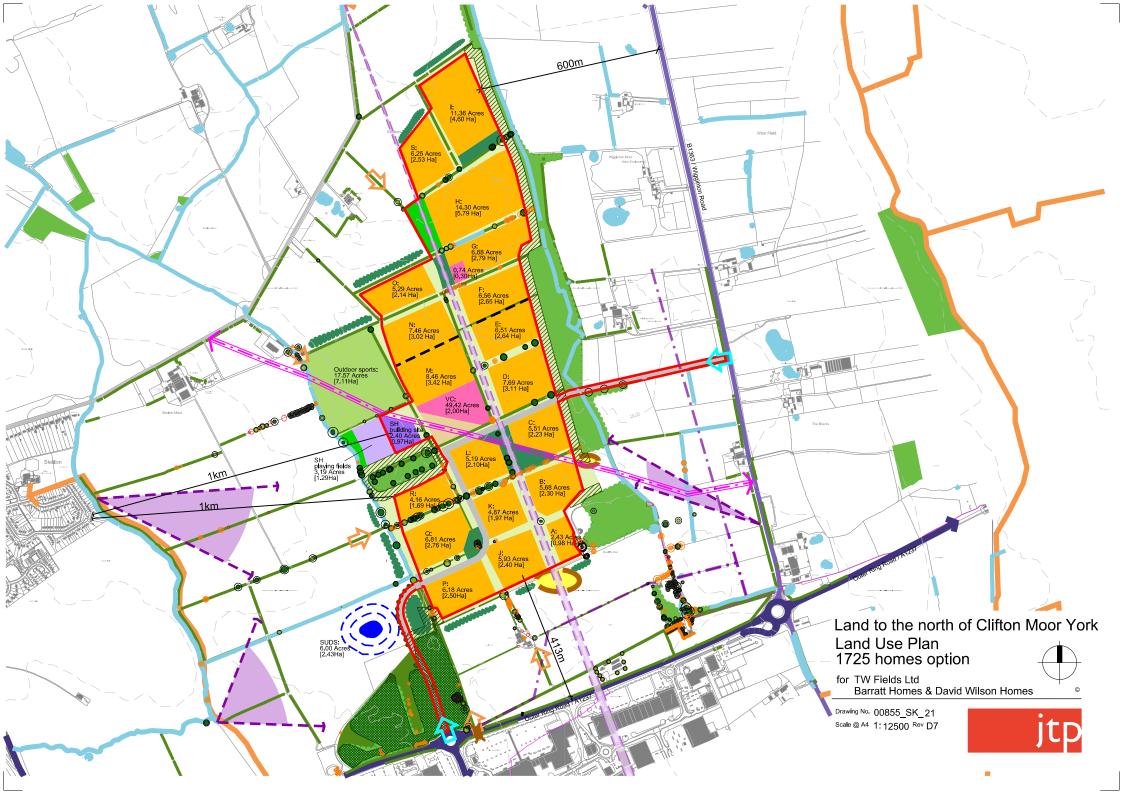
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4(xi)	Coalescence	Key views to York Minster are preserved.	Key views to York Minster are preserved.	Key views to York Minster are preserved.
	with	Positioning of open space on western	Positioning of open space on western	Positioning of open space on western
	Surrounding	boundary; substantial landscaping on all of	boundary; substantial landscaping on all of	boundary; substantial landscaping on all of
	Settlements	the site's boundaries; and retention of	the site's boundaries; and retention of	the site's boundaries; and retention of
		existing woodland areas ensures delivery of	existing woodland areas ensures delivery of	existing woodland areas ensures delivery of
		permanent future boundaries to the site.	permanent future boundaries to the site.	permanent future boundaries to the site.
		Distance from the site's western boundary	Distance from the site's western boundary to	Distance from the site's western boundary
		to Skelton is 1km; eastern boundary to	Skelton is 1km; eastern boundary to	to Skelton is 1km; eastern boundary to
		Wigginton Road is 0.6km; and southern	Wigginton Road is 0.6km; and southern	Wigginton Road is 0.6km; and southern
		boundary to Clifton Moor is 0.46km	boundary to Clifton Moor is 0.42km	boundary to Clifton Moor is 0.25km
4(xii)	Protect/Enhance	All of the site's existing green assets are	All of the site's existing green assets are	All of the site's existing green assets are
, ,	Green Assets	sought to be maintained and enhanced	sought to be maintained and enhanced	sought to be maintained and enhanced
		where possible.	where possible.	where possible.
4(xiii)	Green Space on	16.52Ha of Open Space within the site and	Increased areas of 17.12Ha of Open Space	Significantly increased areas of 27.09ha of
	Western	substantial areas of green space on the	within the site and substantial areas of green	Open Space within the site, including
	Boundary	site's western boundary. Distance from the	space on the site's western boundary.	substantial areas of green space adjacent
		site's western boundary to Skelton is 1km.	Distance from the site's western boundary to	to the site's western boundary. Distance
			Skelton is 1km.	from the site's western boundary to Skelton
				is 1km. Additional open space is also to be
				provided to the site's northern edge in order
				to provide a robust green wedge between
				the site and Moor Lane. It is envisaged that
				the open space in this location will be in the
				form of new accessible areas of woodland
				planting and also land available for the
				expansion of the existing cemetery.

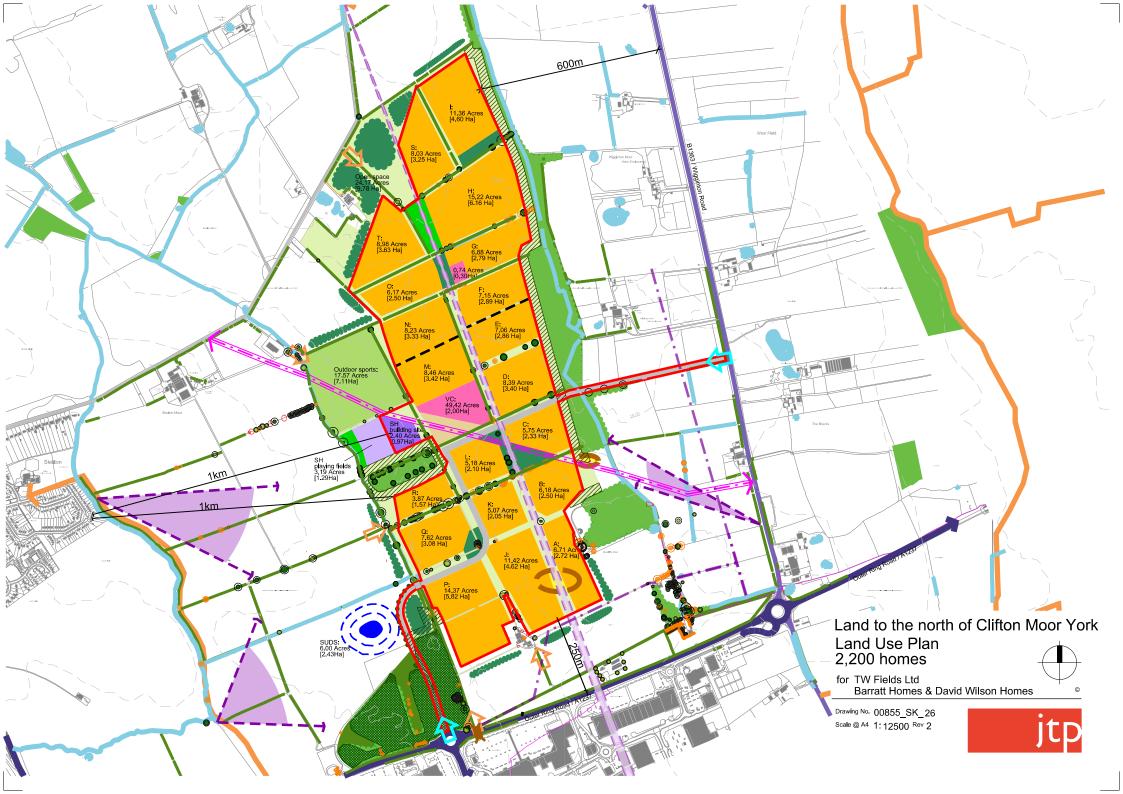
APPENDIX D

Developers Alternative Site Options Masterplans & Land Use Plans









KEYS Constraints

Site boundary

— — - Contour lines

Existing steams or ponds

Existing woodlands surrounding the site (outline representing canopy)

Existing woodlands within the site (outline representing canopy)

Designated woodlands - SINC (Site of Importance for Nature Conservation)

30m buffer to historic woodlands

Existing Category A trees
To be Retained (RPA shown with a circle)

Existing Category B trees
May or May not be Retained
(RPA shown with a circle)

Existing Category C trees
 May or may not be retained- TBC
 (RPA shown with a circle)

Existing dead/dying trees
To be removed

Existing hedgerows
Could be removed - TBC

Existing important hedgerow corridors (8m)
To be retained

Areas of potential archaelogical interest

Emergency Water main with 7.5 m wide easement on each side

Overhead electric services

Existing buildings

Existing A roads (Key vehicular routes)

Existing B roads

Other important vehicular routes

Potential vehicular access into site

Potential pedestrain access into site

Existing PROWs (Public Rights of Way) and bridleways

Existing Key view corridors

Land use

Residential

Primary school-building site

Primary school-playing fields

Mixed-use

Open space with play areas

Outdoor Sports

Allotments

Other green/open space

Primary vehicular route

Proposed structural woodland

Proposed cycle and footbridge [Indictive location]

Indictive SUDS location

Proposed trees [Indictive]

Land to the north of Clifton Moor York
Land Use Plan

Keys

for TW Fields Ltd Barratt Homes & David Wilson Homes

Drawing No. 00855_SK_ Scale @ A4 Rev

