

MATTER 1



JohnsonMowat

Planning & Development Consultants

Examination of the City of York Local Plan

Matters, Issues and Questions for the Examination

Phase 2 Hearings

Matter 1 – Strategic Vision, Outcomes and Development Principles

March 2022

CLIENT: Redrow Homes



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1.0 INTRODUCTION

- 1.1 This response has been prepared on behalf of Redrow Homes in relation to their land interests at Monks Cross, York which is proposed allocation ST8 and land immediately west of, in the Publication Draft Local Plan.
- 1.2 An Outline Planning Application for the development of circa 970 dwellings including infrastructure, open space, primary school, associated community facilities, convenience store and Country Park was submitted on behalf of Redrow Homes (Yorkshire) Limited in January 2018 on the emerging Local Plan ST8 site (18/00017/OUTM). The application was appealed for non-determination Appeal Ref: APP/C2741/W/21/3282969. A public inquiry was held over 4 days 25 – 28 January 2022. At the stage of closing statements, both appellant and LPA were supportive of an approval subject to S106. The decision now stands with the Secretary of State.
- 1.3 Previous submissions have been made to the Local Plan and attendance at the Phase 1 Hearings. The content of previous submissions remains relevant, including the Publication Draft submissions in February 2018, July 2019 Proposed Modifications, Phase 1 Hearings, and the June 2021 Modifications and Evidence Base Consultation. In addition to this statement relating to Examination Matter 1, it should be noted that statements have been prepared for Matter 2, 4, 5, 6, 7 and 8 on behalf of Redrow Homes and Johnson Mowat will be representing Redrow Homes at the Phase 2 Examination Hearing sessions relating to Matters 1, 2, 4, 5, 6, 7 and 8.



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 1 Strategic Vision, Outcomes and Development Principles

1.1 *Does the Strategic Vision, Outcomes and Development Principles set out within Section 2 and provided in policies DP1, DP2 and DP3 of the Plan provide a clear and appropriate framework for the strategic policies set out primarily within Sections 2 and 3 of the Plan?*

It is our understanding that Policy DP1, DP2 and DP3 have not been the subject of modifications following the February 2018 Publication Draft.

Policy DP1 – York Sub Area and Policy DP2 Sustainable Development, set the strategic context and development principles for the subsequent policies in the Plan. For example the detail of the Green Belt to safeguard the special character and setting of the historic city will be discussed in further detail in relation to the approach to setting Green Belt boundaries, and the Council's evidence base to justify the proposed approach.

In relation to Policy DP3 – Sustainable Communities, comments previously submitted regarding the wording of criterion iv) remain valid. The criteria should read

“Ensure ~~the highest~~ standards of sustainability are embedded at all stages of the development;”

There will be cost constraints to having to seek the very highest standards of embedded sustainability which may ultimately be weighed against delivering other benefits such as affordable housing. The highest standards have not been tested in the Economic Viability Appraisal. Further, the 'highest standards' of sustainability are subject to change.

It also remains relevant that paragraph 2.5 should remove reference to “by the end of the plan period sufficient sites will have been identified for viable and deliverable housing sites...” The Plan needs to identify sufficient sites at the start of the plan period rather than by the end.

1.2 *Are the Development Principles set out in the Plan justified, effective and in accordance with national policy?*

Subject to the minor amendment to development principle iv) in Policy DP4, we have no overall objection to the development principles and consider they are justified, effective and in accordance with national policy.



1.3 *Is the overall strategic approach, in terms of the vision, outcomes and principles relating to development, its management and delivering the Plan's development requirements positively prepared, justified, effective and consistent with the Framework?*

We have no further comments to make on the vision, outcomes and principles set out in Policies DP1 – DP4. Our concerns relate to the detail behind the development principles in subsequent policies.

1.4 *Has the Plan been informed by an adequate process of Sustainability Appraisal and Habitats Regulations Assessment in this regard?*

This is for the Council to answer and we look forward to seeing their response and providing comments at the Hearing where necessary.