

**YORK LOCAL PLAN**

**EXAMINATION INTO THE SOUNDNESS OF THE CITY OF YORK LOCAL PLAN**

**Response to Inspector's Matters, Issues and Questions**

**Made on Behalf of Barratt and David Wilson Homes**

**Matter 10 – Housing Mix and Density**

**Introduction**

10.1 These representations are made on behalf of Barratt and David Wilson Homes (Yorkshire East). Our Client has a number of strategic allocations and housing allocations across the city and has made representations at all stages of the plan, together with appearing at the Examination in Public. These representations should be read in conjunction with those representations and also our separate responses to the Councils housing needs assessment.

**The housing land supply overall**

**10.1 Are the proposed densities in Policy H2 appropriate and will they result in the efficient use of land?**

10.2 Our Client has a concern over whether the densities proposed are deliverable and the implications for the delivery of the Councils windfall requirement.

10.3 We welcome the clarification with regards to strategic sites and how these may override the approach in the policy, as this is likely to be the case in order to meet local characteristics and deliver the necessary open space, landscaping and infrastructure. This only covers strategic sites, however there should be reference to the housing allocations as these are equally in some instances unlikely to meet these density requirements.

10.4 The windfall sites are likely to be within existing settlements given the new Green Belt boundaries and as such densities this high may be inappropriate, likewise requiring a higher density is likely to involve a large number of smaller properties and potentially apartments, again unlikely to meet the character of some existing settlements.

**10.2 Is the approach to housing mix, and the 'balancing of the housing market', with reference to the SHMA, in Policy H3, based on sound principles?**

10.5 The policy does not provide for a set mix of homes which is supported as applying the same defined mix to every site can be difficult and inflexible, having no regard to local circumstances. The second half of the policy similarly provides a flexible approach by allowing the final mix of homes to be negotiated with the Council and provides guidance on

this with regards reference to the SHMA and the character of the area, a policy approach similar to many others.

- 10.6 The difficulty raised by the policy however is that this is set in the context of an overarching need to 'balance the housing market', implying a current imbalance and a policy intervention to address this, which may not be based on evidence and may result in a mix of homes inappropriate for a specific site or location.
- 10.7 The wording of the policy is difficult to interpret and could create conflict, where a mix is considered suitable in line with the SHMA, appropriate for an area based on local characteristics, an evidenced based approach on what the actual needs are together with ensuring deliverable and viable schemes. However, that mix may not be considered to meet an undefined definition of balancing the housing market.
- 10.8 In order to add clarity, references to balancing the housing market should be removed from the policy.

**10.3 Does Policy H4 cater adequately for self and custom house building?**

- 10.9 No, the need for self and custom build homes should be made available through a positively worded policy to support applications and if necessary the allocations of sites.
- 10.10 The current approach of adding a 5% requirement to all strategic sites makes no assessment as to the level of need, where this need is and the type of site that people are considering. Simply adding a requirement to the strategic sites may therefore not meet the necessary need in the correct locations.
- 10.11 Similarly to this, adding the provision to the strategic sites is unlikely to deliver custom build homes in the early part of the plan period, again not meeting needs.

**10.4 Will Policy H9 properly address specialist housing for older people?**

- 10.12 No. Given the tightly drawn boundaries of the new Green Belt the available windfall sites is likely to be minimal and therefore the majority of homes are to be delivered through provision within the strategic sites.
- 10.13 Again, this raises questions regarding the location, the needs in those locations, the potential for people to have to move to different parts of York rather than having their needs met locally and the timing of the delivery, with strategic sites delivering market housing, affordable housing, self and custom bud homes and older persons accommodation.
- 10.14 Whilst the large strategic sites will be creating new communities and a mix of accommodation will form part of that, some of the strategic sites do not operate in this manner. For example our clients site ST33 at Wheldrake is located adjacent to an existing

town approximately eight miles from York. There is no evidence to suggest that this location has a need for 5% self build homes and older persons accommodation.

- 10.15 Whilst these needs would be considered in the assessment of the appropriate mix, placing a set requirement that may not be necessary is not considered a sound approach and a more positive and proactive way of delivering these needs should be considered.