

PHASE 3
MATTER 10



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Planning & Development Consultants

Examination of the City of York Local Plan
Matters, Issues and Questions for the Examination

Phase 3 Hearings

Matter 10 – Housing Mix and Density

July 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.
- 1.1 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.
- 1.2 Previous submissions have been made to the Local Plan Examination, including attendance at the Phase 1 and Phase 2 Hearings. The content of previous submissions remains relevant, including the Publication Draft submissions in February 2018, July 2019 Proposed Modifications, Phase 1 and Phase 2 Hearing Statements, and the June 2021 Modifications and Evidence Base Consultation. In addition to this statement relating to Examination Phase 3 Matter 10, it should be noted that statements have also been prepared for Matter 1, Matter 4 and Matter 9 on behalf of Redrow Homes, and Johnson Mowat will be representing Redrow Homes at the Phase 3 Examination Hearing sessions relating to Matters 1, 4 and 10.
- 1.3 A Statement of Common Ground specific to Policy SS10 (Site ST8) has been drafted and it is anticipated that by the time the Phase 3 Hearings commence the Statement of Common Ground will be signed by all parties.



2.0 RESPONSE TO INSPECTOR'S QUESTIONS

Matter 10 Housing Mix and Density (Policies H2, H3, H4 and H9)

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

2.1 We are concerned that some of these higher densities may be difficult to achieve in the urban area where the numbers require 'higher level' development which does not sit comfortably with preserving views of the Minster.

Q 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?

2.2 While we generally support the aims of the mix policy H3, care needs to be taken in the reference to the 2016 SHMA and how market demands change over time. It is recognised that post covid, many employees are taking the opportunity to work from home either part-time or full time and the benefits that arise from this including a reduction in car use and congestion.

2.3 The fixation of mix policies with bedroom numbers needs to recognise the way in which home space is being consumed and how larger dwellings in the mix (eg 3 and 4 bed) are helping to facilitate home working.

2.4 Ideally, home working needs to be recognised within the Policy wording. Our suggested wording below is.

• 'Proposals for residential development **should seek to** ~~will be required to~~ balance the housing market by including a mix of types of housing which reflects the **local market demand and the diverse mix of need across the city**' for both bedroom numbers **and space for home-working in the dwelling where possible.**

• 'The housing mix proposed should have reference to the SHMA and be informed by:

• Up to date evidence of need including at a local level;

• **Market demand and local aspirations;** and

• 'The nature of the development site and the character of the local surrounding area'.

• 'Applicants ~~will be required to~~ **should** provide ~~sufficient~~ **proportionate** evidence to support their proposals'.



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

- 2.5 While we are supportive of the principle of Self and Custom Build, we are unconvinced these aims are best delivered on Strategic sites and have yet to see any evidence of why those on the Council's Self Build register have expressed a preference to be on a strategic housing site.
- 2.6 There are issues on where within a strategic site such plots could be facilitated and over what timescale they are expected to be delivered. In all likelihood, self build would sit best in its own separate zone.
- 2.7 Guidance on how self build plots would contribute to infrastructure and obligations is missing – presumably the self build plots would make a contribution to affordable housing in a commuted sum payment but this would fall below the 2 dwelling threshold in Policy H10 and Table 5.5.
- 2.8 It is our view that the Plan needs to allocate a series of small sites, up to 20 dwellings at a low density to deliver on self build. In its current form, it looks as though the Council have been unable to find a solution in the Plan and simply handed the problem to the bigger developers.

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

- 2.9 We share the HBF response on this matter. Further clarity is required and older persons housing should only be provided on strategic sites where it is proven necessary. Many providers of elderly housing prefer smaller bespoke sites of circa 1 acre for 70 bed dwellings. There is no evidence to suggest they would seek to be on strategic sites.