

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 4 – Strategic Sites

Introduction

4.1 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.

Spatial strategy

4.7 Is the allocation and associated Policy SS9 relating to ST7 soundly based?

4.2 The allocation is soundly based, it has been consulted on through various version of the plan as a draft allocation and supported by our client, together with other landowners Taylor Wimpey and TW Fields. The site has been subject to sustainability appraisal, meets the Councils spatial strategy and distribution and has been supported by a host of technical reports and masterplans.

4.3 We do however consider that the site boundaries and capacity for the site should be amended to accommodate a larger number of homes.

4.8 Are the Green Belt boundaries of the ST7 site reasonably derived?

4.4 No. the site is allocated for 845 homes and as per the comments above a larger allocation of either 975 or 1225 homes could be delivered, which would require an alternative Green Belt boundary, as per our representations. These boundary amendments would be subject to any modification on the overall size of the allocation, which is dependent on other matters.

4.5 Notwithstanding the necessary boundary amendments should it be considered that the allocation should be increased, the Green Belt boundary surrounding the allocation if it remains the same size are considered unsound.

4.6 The site is currently proposed with an off set between the new homes and the existing settlement of Osbaldwick to the south and the east. These small areas of land between the

new development and the settlement are proposed to be retained as Green Belt, which is inappropriate.

- 4.7 The Framework is clear that land which is not necessary to be kept permanently open should not be included in the Green Belt and that boundaries should endure beyond the plan period. The land does not meet the five purposes of the Green Belt and in any subsequent review the land is likely to be questioned.
- 4.8 Given the Councils reasoning relates to landscape and heritage matters, other development management tools could be used rather than allocating the land as Green Belt. Leaving the land outside of the Green Belt can still maintain an open area of land and using development management tools can prevent development, however it can enable the land to be used for drainage, open space and be included in the masterplan for the site enabling the existing boundary of the allocation to be maximised for development.

4.11 Is the allocation and associated Policy SS11 relating to ST9 soundly based?

- 4.1 The allocation is soundly based, it has been consulted on through various version of the plan as a draft allocation and supported by our client and Vistry Homes who jointly control all of the land. The site has been subject to sustainability appraisal, meets the Councils spatial strategy and distribution and has been supported by a host of technical reports and masterplans.
- 4.2 The site has also been included in the Haxby Neighbourhood Plan as the most appropriate location for new homes and has received very little local opposition.
- 4.3 Our Client and Vistry have recently agreed a collaboration agreement for the delivery of a planning application, a full team to prepare a planning application has been appointed and a screening opinion prepared and submitted. An application is likely to be ready for submission in September subject to the local plan examination.
- 4.4 The allocation is suitable and deliverable and the two housebuilders are keen to bring it forwards in the short term to enable delivery of homes early in the plan period.
- 4.5 With regards the policy requirements for the site, discussions have been taking place with the Council and a number of modifications are proposed to the policy. There are however some areas of outstanding concern that we consider to be unsound.
- 4.6 The first criteria requires a 'high design standard'. Whilst our clients propose to deliver a high quality development, we are concerned how this policy would be interpreted as there is no clear definition of high standard. Adding tests such as this imply that this site should be developed to a better standard than other sites that do not have this requirement, however there is no evidence or reasoning that this should be the case. Likewise for

decision makers, there is no way of assessing this criteria as one interpretation could be very different to another. The wording should therefore be amended in line with other strategic sites or deleted.

- 4.7 The third criteria provides a requirement for new open space to the south for the site, as per the proposals map. There is no requirement for this in the evidence and appears as an arbitrary split between the existing settlement and the new. The new housing should be an integrated extension of Haxby and the open space located in the most appropriate location following a masterplanning exercise.
- 4.8 There is no evidence for putting the open space in this location and it is considered unsound and should therefore be deleted.
- 4.9 The open space provision should also be developed in liaison with town and parish councils, neighbourhood plan group and local residents. Whilst the planning application will be subject to public consultation and engagement with all of these groups is planned, the explicit involvement of them as a policy requirement is unnecessary, could lead to different groups wanting different things and again is unsound and should be deleted.
- 4.10 Criteria four requires a series of local facilities, including shops and services. The site is located in very close proximity to the town centre and is within easy walking distance of a large range of shops and services. The residents of the site are going to be closer to the existing facilities than many existing residents and there is no identified deficiency or shortfall that the site should provide.
- 4.11 There is no evidence to show why this is needed and the requirement is considered unnecessary and should be deleted as unsound.

4.12 Are the Green Belt boundaries of the ST9 site reasonably derived?

- 4.12 Our Client has no comments on the boundaries of this site.

4.13 Is the allocation and associated Policy SS12 relating to ST14 soundly based?

- 4.13 The allocation is soundly based, it has been consulted on through various version of the plan as a draft allocation and supported by our client, together with other landowners TW Fields. The site has been subject to sustainability appraisal, meets the Councils spatial strategy and distribution and has been supported by a host of technical reports and masterplans.
- 4.14 The Councils evidence base fully supports this as does the approach to the Green Belt and meeting the Councils sustainability objectives. The principle of a large stand alone settlement in the Green Belt was noted as appropriate in correspondence between PINS and the Council and technical consultees, including Historic England support this approach.

4.15 We do however consider that the site boundaries and capacity for the site should be amended to accommodate a larger number of homes. Technical work and masterplanning has demonstrated that the site could be increased to either 1725 homes or 2200 homes

4.14 Are the Green Belt boundaries of the ST14 site reasonably derived?

4.16 Should it be considered that the site could be enlarged then the boundaries too would require alteration, however this would be dependent on the findings of the plan as a whole and any modifications that need to be made, therefore we do not comment on this further.

4.17 With regards to the boundary drawn, we do not consider that this includes sufficient flexibility to deliver the site.

4.18 Whilst the allocation is sound, the Councils boundary is drawn very tightly, requiring potentially high density development and a constrained masterplan. Whilst land outside of the allocation could be used for drainage, open space and landscaping to assist with this, a detailed masterplanning exercise should guide that, such as that done by ourselves. Open space and drainage should be located within the new community not on its periphery

4.19 Should all of these elements also be included within the boundary it is likely that the site would be developed at a 60% net deliverable area and at a density of 32 dph, this would result in a shortfall of almost 300 homes. Sufficient land exists to amend the boundary to provide flexibility and enable an appropriate masterplanning exercise to take place without conflicting with Green Belt policy.

4.19 Is the allocation and associated Policy SS18 relating to ST33 soundly based?

4.20 A planning application is currently pending with the Council, demonstrating the suitability and deliverability of the site. The application has been lodged in accordance with the draft policy and no objections are raised.

4.20 Are the Green Belt boundaries of the ST33 site reasonably derived?

4.21 Our Client has no objections to the Green belt boundaries.