

YORK LOCAL PLAN - SAFEGUARDED LAND draft

York Environment Forum response

read with the following:-

York Environment Forum: **Further Sites Consultation** July 2014

York Environment Forum: **New Housing for York-a change of direction** Dec.2015

CONTEXT

The "Local Plan Publication Draft 2014 Annex A" page 35 lists 13 "safeguarded" sites, including employment land, of some 335ha., of which 271ha. was allocated for housing. The housing sites are:-

- SF1- Strensall village *
- SF2 - Cliftongate
- SF3- Whinthorpe
- SF4- North of Haxby
- SF5 - West of Copmanthorpe
- SF9 - East of Dunnington
- SF10-Elvington
- SF11-East Field,Wheldrake
- SF12-Moor Lane,Woodthorpe
- SF14-Earswick
- SF15-North of Escrick

*subject to a Public Inquiry

The "Further Sites Consultation" document of June 2014 page 36ff. allocates approx.360ha. safeguarded land for **housing**. The "Technical Appendix 6" pages 3-4 allocates **380ha.** , implying an equivalent loss of agricultural land. This figure is used in this document.

The "Technical Appendix 13" indicates potential "quantums" of development within sites, including the "safeguarded" sites, which could possibly be developed for housing. The densities envisaged range from 50 units/ha. in exceptional cases, to between 30-40 units/ha. generally.

ANALYSIS

Council policy is generally to allocate the proposed "safeguarded" sites as extensions to the development sites already proposed for additional housing, with the caveat that these sites could not be put forward for development until after the end of the Local Plan period in 2030. The possible increase in housing units over all the sites is shown below:-

total site area 380ha.

70%developable area=**266ha.**

@ 30units/ha.	7980
@ 35units/ha.	9310
@ 40units/ha.	10640
@ 50units/ha	13300
@ 60units/ha	15960

This indicates a possible increase in housing of between 8000 and 16000 units, over and above those which could be built on the existing proposed allocated sites,

although it is unlikely that the highest densities would be put forward uniformly in what are essentially rural locations.

There is no doubt that in the longer term some or all of these sites will come forward for development, should the forecasts for housing demand be correct, and meanwhile be incorporated in agreed options for "landbanking" by developers.

This being the case the proposals for the initial allocated sites to which they are attached **must** include infrastructure options and master planning for complete settlements which would eventually include the "safeguarded" sites. If this is not done York could end up with a series of fragmented and disfunctional communities developed on an ad-hoc basis, should development on these sites be approved.

The York Environment Forum's response to the "Further Sites Consultation" recommended that several sites should either be modified or deleted from the programme as being unsustainable. To implement the policy of safeguarding extension sites as proposed would invoke the same criticism.

CONCLUSION

Government requires all allocated sites to be sustainable and deliverable, and logic suggests that this must also apply to safeguarded sites, as they are likely to be brought forward as soon as the moratorium on development ends in 2030. It is likely that developers will successfully appeal against any refusals, as the presumption is in favour of development.

The York Environment's "New Housing for York" suggested a complete review of housing densities as a way of reducing the greenfield landtake for new development.

A further stage would be to review the predictions on employment, housing need and population growth, which are speculative, and driven by the "growth at any price" agenda. This could lead to a forecast reduction in new housing requirements, with a consequent reduction in the need to safeguard land. If it were still necessary under existing legislation to provide safeguarded land this could be allocated to those areas released under a revised increased density programme, enabling the greenbelt boundary to be drawn closer than at present envisaged. This is **not** the YEF's preferred option.

The Secretary of State at the DCLG (quoted at the LPWG on Jan.29th.2015) has stated his support for a planning system *".....where local people can own the planning agenda for their communities and so shape and deliver development where they live. Such engagement is the key to creating a planning system that works **with** not **against** local communities"* (YEF emphasis).

If the concerns expressed by the YEF, and many others, are not effectively countered, the task of gaining approval for the emerging Local Plan before submission to examination in public could become difficult.

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