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Dear Rachel

#### **York: Draft York SHLAA**

Further to our recent telephone conversation, we write on behalf of Barratt Homes to comment on the outcome of the LDF Working Group meeting on the 09<sup>th</sup> March 2009, where the draft SHLAA was considered. In particular our comments relate to the decision to seek amendments to the draft SHLAA to remove reference to 'Sites within the Draft Green Belt' as being potentially suitable for housing development (subject to conformity with the emerging Core Strategy and following a detailed evaluation of the Green Belt value).

It should be noted that minutes of the 09<sup>th</sup> March Working Group meeting are not currently available. However, we understand that the above represents a fair summary of the outcome of the meeting, in respect of 'Sites within the Draft Green Belt'.

We are aware that a further LDF Working Group meeting is to take place on 06<sup>th</sup> April 2009, during which the 'Approach to the Spatial Strategy' paper will be considered. Given that the SHLAA will form a key part of the evidence base for the emerging Core Strategy document and the need for the Core Strategy to provide a strategic framework to guide housing and other development for the emerging LDF period, Barratt Homes requests that the following comments are reported to the LDF Working Group at its forthcoming meeting.

It should be noted that these representations seek only to provide comment on the correct approach to 'Sites within the Draft Green Belt'. More detailed comments on the draft SHLAA and the emerging spatial strategy will be made by Barratt Homes in due course.

#### **Need for 'Sites within the Draft Green Belt'**

The following assesses the housing land supply position in York against housing requirements. It demonstrates that there is a shortfall in identified supply and that 'Sites within the Draft Green Belt' will be required in order to meet housing requirements over the emerging LDF period.

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### Housing Requirement

The RSS housing requirement for York is 640 net additional dwellings per annum (dpa) for the period 2004-2008 and 850 dpa for the period 2008-2026. The emerging LDF period will extend beyond the RSS end date to 2030. The following housing requirement table assumes that the RSS rate of 850 dpa will extend to 2030. This results in a total requirement of 21,260 units for the LDF period (as identified below).

<b>Period</b>	<b>Housing Requirement</b>
2004-2008	2560
2008-2026	15300
2026-2030	3400
<b>Total (For Emerging LDF Period)</b>	<b>21,260</b>

### Housing Supply

The draft SHLAA calculates the total housing supply position in York for the emerging LDF period (i.e. until 2030), based on net completions since 2004 (i.e. the base date of the RSS); outstanding planning permissions (discounted at 5% to allow for non-implementation on unallocated sites); and, potential housing sites in the SHLAA (including housing allocations without planning permission). This is set out in the following table:-

<b>Source of Supply</b>	<b>No. of Dwellings</b>
Net Completions (2004-2008)	3387
Net Dwellings with Outstanding Planning Permission	4431
Potential Housing Sites in SHLAA (excluding 'unknown' sites and 'Sites within the Draft Green Belt')*	6866
<b>Total Supply</b>	<b>14,684</b>

The above supply position assumes that all of the commitments and SHLAA sites will come forward in line with the Council's expectations and is based on a number of assumptions relating to the yield from sites and timescales for their delivery. The position also assumes just a 5% allowance for the non-implementation of planning permissions on unallocated sites (with no allowance for the non implementation of permissions on allocated sites). Barratt Homes has concerns about some



of these assumptions, which will be set out in full in further detailed representations on the draft SHLAA.

Notwithstanding the above, the draft SHLAA does not identify a sufficient supply of housing land to meet requirements. Based on the Council's own calculations, there is a shortfall in supply of 6576 units.

The draft SHLAA does identify additional land as being potentially suitable for housing development, but which is currently not included within the housing supply calculations (i.e. the 'Unknown Sites' and 'Sites within the Draft Green Belt'). It should be noted however, that the potential supply possible from the 'Unknown Sites' is only 1938 units. Even in the unlikely event that all of these came forward for development, there is still a significant shortfall of housing land. The only other sites identified as being potentially suitable for housing development, following the Council's assessments during the SHLAA preparation process, are those within the draft Green Belt. It therefore follows that some of this land will be required to meet requirements and to allow for the genuine consideration of site selection options through the LDF process.

### **Compliance with the Spatial Strategy**

The RSS (2008) [Policy YH4] makes clear that the regional and sub regional towns and cities, such as York, are the prime focus for housing (and other) growth and development in the region. The RSS [Policy YH9] also specifically supports the local review of Green Belt boundaries to meet identifiable development needs, where locations in existing regional and sub regional towns and cities are not available and where alternative sites would be less sustainable.

The boundaries to the York Green Belt are not currently designated in the development plan. It is a specific requirement of the RSS to define realistic Green Belt boundaries around York, through the emerging LDF, to establish long term development limits that safeguard the special character and setting of the city. The RSS [Policy YH9C] clearly states that:-

*"The boundaries must take account of the levels of growth set out in this RSS and must endure beyond the Plan period".*

The findings of the draft SHLAA confirm that development requirements for York can not be accommodated within the existing urban area. As such, sustainable extensions to the urban area will be required. In the context of the above, the approach in the draft SHLAA to identify sustainable sites within the draft Green Belt of York as being suitable for development, subject to compliance with the emerging Core Strategy is fully compliant with the provisions of RSS. It will also be essential that the emerging Core Strategy is flexible and provides a strategic framework to support the identification of suitable, sustainable sites within the draft Green Belt in order to meet development requirements for York.

### **Conclusion**



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In conclusion, it is clear that potentially suitable housing sites in the draft Green Belt around York will be required to meet development requirements over the emerging LDF period. As such, the approach in the draft SHLAA (i.e. to identify sustainable draft belt sites as being suitable, subject to compliance with the emerging Core Strategy) is wholly appropriate and is supported by Barratt Homes. It is also essential that the emerging Core Strategy supports the definition of a realistic Green Belt boundary that takes full account of development requirements and provides a strategic framework to support the identification of suitable, sustainable sites within the draft Green Belt.

We would be obliged if the above representations could be reported to the LDF Working Group at its forthcoming meeting on 06<sup>th</sup> April 2009.

Please contact us if you have any queries.

Yours sincerely

John MacKenzie  
Associate Director