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Our ref: General/40b – Planning Conformity/Final responses/York Allocations Issues and Options May 2008

16 May 2008

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Dear Martin

City of York Local Development Framework - Allocations Issues and Options Consultation

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Allocations Issues and Options document for York City Council and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the Core Strategy is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004), the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005) and The Secretary of States Proposed Changes to the Yorkshire and Humber Plan (September 2007).

Government guidance (paragraph 4.19 in PPS12) states: "Where the regional spatial strategy...has been through an Examination in Public, and the proposed changes have been published, considerable weight may be attached to that

strategy because of the strong possibility that it will be published in that form by the Secretary of State”.

As the Proposed Changes are now published, Assembly responses to consultations on DPDs need to make it clear how the Proposed Changes impact on the policies quoted and to point out to local authorities that ‘considerable weight’ will need to be attached to them by the decision-making body and by Inspectors at Examinations of DPDs. At the same time, it will be important to note that the Assembly itself has made comments on the Proposed Changes. It is also worth noting that the final version of the new RSS is expected very soon, in May 2008.

Both the existing and draft Regional Spatial Strategies aim to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region’s city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).

Key Points on the Allocations Issues and Options Document

Overall, we feel that the consultation papers, the options within them and the sustainability appraisal provide a comprehensive review of the detailed issues facing the allocation of land within the City of York and how they might be tackled in order to achieve sustainable development. We also commend you on links made between the document, the Core Strategy and the Regional Spatial Strategy, which provide a very clear basis upon which to assess alignment.

Below is a summary of the main points the Assembly wishes to raise with regards to the Allocations: Issues and Options. Annex A provides further detail for each of these issues in line with the key issue reference numbers.

1. Welcome the Issues and Options Paper in general,
2. Welcome the range of issues and options addressed,
3. Raise an issue with the proposed green belt boundary in terms of its permanence, its extent and its identification of major developed sites close to the sub-regional city boundary,
4. Support the approach to housing allocations but draw the City Council’s attention to the ARUP report and its conclusions on windfall contributions,
5. Support the approach to a local Employment Land Review and seek to clarify any discrepancy between Published RSS and the Issues and Options Paper as soon as possible,
6. Support in general the approach to transport, but raise an issue with regard to the dualling of the outer ring road.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you prepare the Core Strategy Preferred Options. Clearly we wish to see

the Core Strategy developing in general conformity with the Regional Spatial Strategy and I would be happy to discuss the points we raise here further if it would help this process.

Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy and to commenting on the Preferred Options document in due course.

Regards

Mat - Elliot

Martin Elliot
Planning Policy Manager

ANNEX A: ASSEMBLY COMMENTS ON ALLOCATIONS ISSUES AND OPTIONS INITIAL CONSULTATION

Key Issue GB1

The Assembly recognises and supports the City Council's continued work in defining a green belt boundary in line with national and regional guidance. RSS Policy YH9 calls for a detailed boundary to be defined in order to establish long term development limits that safeguard the setting of the historic city. The RSS also notes that "boundaries must take account of the levels of growth set out in this RSS and must also endure well beyond 2026" i.e. the life of the RSS.

However, as you will be aware the levels of growth that RSS have had to accommodate have been particularly subject to change. This is set out for your information below:

- The Secretary of State's changes recommended 22,000 additional homes per year from 2008.
- Technical work carried out for the Secretary of State on the proposed changes to the RSS and the more recent national household forecasts shows that around 25,000 new households may be forming each year.
- The Government has announced that there should be a new national target for the delivery of 240,000 new homes a year by 2016.
- The Government's advisors on the affordability of housing (the National Housing and Planning Advice Unit) has indicated in its response to the Housing Green Paper that the region may need to plan for between 26,000 and 30,000 additional homes per year.

In line with this initial and continued step up in growth the Assembly has been required by Government to rapidly review the RSS, due to be published in May 2008. In light of this request and growth agenda the Assembly made representations on the Proposed Changes calling for Policy YH9C to be extended until 2031 so as to allow sufficient accommodation of potential long term growth.

In that context the Assembly is concerned that the proposed boundary is too tight to endure beyond 2031 and may not be in alignment with RSS policy YH9. PPG2 states in paragraph 2.1 that "the essential characteristic of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead." Clearly the Assembly is now in a position to see further ahead than when RSS was being prepared. While it is not for local authorities to identify sufficient land to accommodate anticipated growth at this time, the Assembly encourages the City Council to acknowledge that there is likely to be a need to accommodate significantly more development in the York area than that envisaged during the preparation of RSS. The Assembly therefore recommends that York City Council allocate safeguarded land in the green belt for longer term development needs. Fortunately the progression of the York LDF and allocations paper is at a stage where such longer term concerns can be adequately addressed.

We are also concerned that the boundary as proposed may include land that does not need to be kept permanently open so as to meet the purposes of the green

belt. One of the most important purposes of the York green belt is to maintain the historic setting of the City of York. While we support the designation of a green belt boundary on that basis we encourage you, through this process and in considering preferred options, to adopt a more realistic and strategic approach to the establishment of a green belt boundary that assesses the opportunities of land which does not fulfill this primary green belt function to accommodate potential future growth.

We note that the Council has identified a series of potential major developed sites, some of which are close the main urban area. As part of the Council's SHLAA work and/or in light of the comments above the Assembly considers that these large sites might be considered as urban extensions in line with RSS Policy YH8 (should they fall out of use) rather than stand alone sites for development set in the green belt.

We note that some sites (existing employment sites) are not washed over by the green belt but also do not have a boundary around them e.g. south of Dunnington. We assume that this is a drafting error.

Key Issue H1

The Assembly welcomes the use of a SHLAA to determine sufficient allocations for housing. In phase 2 the Council should consider how green field sites on the edge of the main urban area may contribute towards the provision of housing land. To that end, those major developed sites on the edge of the main urban area and land around them where appropriate should be considered.

The Assembly recognises the difficulty that Local Authorities have in following PPS3 advice to preclude windfall calculations from the assessment of housing land capacity. While the Assembly acknowledges that windfalls have historically counted for a significant part of York's housing development a newly published report for the Assembly by ARUP consultants has concluded that it likely that only in the City of Kingston upon Hull may windfalls be used to determine capacity in line with government guidance.

We note the absence of sites for Gypsies and Travellers in the allocations document. Given that the North Yorkshire GTAA is now at a very advanced stage of development the City Council should consider how its findings will be integrated into the LDF process and how the housing allocations document.

Key Issue E1

The assembly welcomes the evidence provided by the Employment Land Review. Paragraph 6.11 refers to the SQW forecasts versus the RSS forecasts and that the Council considers the SQW forecasts, rather than the RSS, to be correct. While this is an unusual term to use to an estimate of future activity the Assembly acknowledges the discrepancy. At this time the Published version of RSS is not available. Once published in May the Assembly will be happy to engage with York City Council on any differences between regional and local calculations, potential to

address this and indications as to the level of allocations identified to meet the need for employment land. It would seem premature to have such debates now given that the publication of RSS is very close.

The Assembly concurs with views that the London Bridge site is contrary to the RSS Core approach in that it is outside of the Sub-Regional City and lacks the necessary transport accessibility to make it sustainable.

Key Issue T1

The Assembly supports enhanced park and ride provision in the locations identified. These are in line with the RSS and the Regional Funding Priority Schemes recently agreed by the Regional Transport Board.

Key Issue T2

The Assembly supports the idea of a new station at Haxby. This is in line with the Regional Transport Priorities in the RSS.

Key Issues T3

While the tram – train line is not explicitly mentioned within RSS it is supported in that it aligns with the intention to improve public transport between Leeds, Harrogate and York.

Key Issues T4

A multi-modal interchange is supported by the Assembly as it would align with RSS Policies T1 and T3. Policy T1 states that the aim is to improve public transport and accessibility by non-car modes. Policy T3B3 notes that a public transport interchange in York would be a regional priority.

Key Issues T5

The Assembly has concerns regarding the upgrading of the outer ring road to dual carriageway. York City Council should consider how this would align with policies in the RSS to reduce dependence on the car. Specifically, Policy T1 seeks to address congestion through positive measures including giving priority to improvements to public transport and encouraging a shift from car based to public transport based commuting. It is likely that dualling the outer ring road will run counter to these aims. Policy T1F also recommends that where local conditions justify them, road charging schemes should be introduced in congested areas. The Assembly notes that this has not been considered as an option at this stage.

Finally, the City Council should also consider how such proposals would align with Policy Y1 which states that stronger demand management should be implemented in York.