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Martin Grainger  
Environment and Development Services  
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Dear Martin

### **City of York Local Development Framework: Core Strategy Issues and Options**

Thank you for consulting the Yorkshire and Humber Assembly on the Core Strategy Issues and Options document for the City of York. I am sorry that this response will arrive after your consultation deadline and I trust that you will still be able to take our comments into account at this stage in the process.

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of their Local Development Framework are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

We think it would be helpful if this need for general conformity were set out at the start of the Core Strategy as this demonstrates the need for a strong link between the LDF and the RSS and will help to clarify the significance of the references to the RSS that are made throughout the document.

It is also crucial that the correct terminology is used in relation to the **current** Regional Spatial Strategy (based on the Selective Review of RPG12 December 2004) and **draft** RSS (the draft Yorkshire and Humber Plan submitted to the Secretary of State in December 2005). At present, these regional documents are described in different ways in each chapter of the Issues and Options document and references are made to policies in one that are actually found in the other - this could clearly cause confusion and needs to be put right. The particular instances where this arises are highlighted where relevant throughout this response.

Because we are in a moment of time when there is an existing and an emerging RSS, these Assembly comments are based on both documents. The comments place emphasis on draft RSS, which reinforces and develops the general thrust of existing RSS; furthermore it is more up to date and has significant "weight" in its own right. The weight attached to the draft RSS will increase as it passes through its Public Examination (September and October 2006) and once the Panel's Report is received (expected Summer 2007) before it is issued by the Secretary of State (expected late 2007).

At this stage in the drafting of the Core Strategy, 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 RSS 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.

## **Sustainable Spatial Strategy**

Notwithstanding the points made above, we welcome the references to the Regional Spatial Strategy throughout the document as a means of setting this Core Strategy in its wider context. In Economy and Employment (section 7), the role of York in relation to the Leeds City region and its important role in the York sub area, as set out in draft RSS, is described. However, no such regional or sub-regional picture from the draft RSS is included in the Sustainable Spatial Strategy for York section (4). In addition, the desired outcomes for the York sub-area as set out in Section 9 and Policy Y1 of Draft RSS are not explicitly set out anywhere in the document. We think it would be helpful to do so, demonstrating what drivers for change and opportunity the local planning framework needs to respond to from the regional and sub-area perspective.

Section 4 concentrates on setting out the principles upon which the spatial strategy for the City of York might be developed. To reflect the principles of sustainable development it would perhaps be helpful to include specific reference to the need to address social issues and the demographics of the population (this is drawn out in other sections of the paper but not explicitly addressed in relation to the overall spatial strategy).

It is perhaps surprising that this section does not set out how the overall principles might be translated into patterns of development on the ground and how there would be different ways of addressing the needs that are identified through different 'spatial options'. Once these are developed the Assembly will be happy to comment on them with regards to their general conformity with the RSS.

In relation to the York Green Belt, it will be important to consider Policy YH9 of Draft RSS when developing the Core Strategy.

## **Energy**

We support the proposed inclusion of policies in the Core Strategy that would require at least 10% of energy to be used in sizeable new developments to come from on-site renewable energy sources. For the correct reference, this is in line with Policy ENV 5B(iii) of Draft RSS (December 2005). We would also suggest that both 'the promotion of measures to implement energy efficiency measures in new development and construction practices' *and* 'ensuring sustainable waste management of materials in construction practices' are important principles rather than the suggestion (page 38) that one or other of these is included in the Core Strategy.

## **Housing**

On pages 40 to 41 there appears to be confusion between the housing figures and policies of current and draft RSS. To clarify:

- Current RSS was published in December 2004. It was based on a Selective Review of RPG12 and this review did not change the housing figures that were in the original RPG12 published in 2001. Current RSS therefore contains housing figures for the whole of North Yorkshire and York and does not provide local authority specific figures for the North Yorkshire districts and City of York.
- Draft RSS (submitted to the Secretary of State in December 2005) sets out housing figures on an authority-by-authority basis. The distribution of the overall regional total has been driven by a desire to ensure that housing development across the region supports the implementation of the spatial strategy and locational principles (set out in Core Policies YH1-YH9) of Draft RSS. The housing figures for the City of York are correctly quoted in the Issues and Options document as being 640 (net) per annum from 2004 to 2016 and 620 (net) per annum from 2016 to 2021
- Draft RSS sets the target for building on previously developed land as an average of 60% for the City of York

We are pleased to see the issue of affordable housing covered in the Issues and Options document. As the Council prepares the Core Strategy it will obviously be able to take into account the updated Housing Needs Study (referred to on page 43). It is unlikely that RSS will contain district-by-district affordable housing targets and the Issues and Options paper correctly reflects Draft RSS Policy H3 in advising local authorities to seek over 40% affordable housing on developments of more than 15 homes in areas of high need, of which the City of York is one.

With regard to the provision of sites for gypsies and travellers, the next stages in the preparation of the Core Strategy will be able to draw upon the work that has been undertaken across the region to identify areas of high need.

The Key Issues and Options set out on page 46 identify some important factors to be considered in accommodating the housing needs of the City's population. It would perhaps be useful to present in more detail the choices that need to be made about where in the area housing could be developed, what its relative distribution pattern across the district could be and therefore the implications that this has for the split between greenfield/brownfield development, whether there might be a need for planned extensions and so on. At present, it is difficult to evaluate whether the strategy for housing provision is in general conformity with the RSS beyond the housing numbers that are quoted. We look forward to commenting further as this work is progressed.

## **Economy**

On page 48, it would be useful to make reference to the current RSS rather than RPG12.

The draft RSS sets out a policy framework that:

- Encourages local authorities to determine the pattern and scale of allocated employment land that is needed based on up to date regional and/or local forecasts (Policy E3)

- stresses the need for quality sites to be provided to accommodate a range of employment types (Policy E1)
- provides clear locational guidance for all types of development (Policies YH1 to YH8)

Based on a methodology that uses consistent forecasting across the region, tables 14.6 and 14.7 of Draft RSS seek to provide indications of the amount of employment land that might be needed in different parts of the region. In addition, table 14.8 sets out some key messages that local employment land reviews will need to take into account. For York, this states that:

'A full range of sites, including a significant supply of quality land suitable for B1 uses, over forecast trend will be required. The review will need to support the needs of developing initiatives such as York Science City and the role of York as a key component of both the York and Leeds City Region Sub Area approaches'.

The work carried out for the Council in 2000 suggests a different scenario for the future growth of employment and the sites needed to accommodate this growth than that reflected in the Draft RSS. We would suggest that, as the Core Strategy is developed, the Council might wish to consider updating this work and we would be happy to discuss this further over the coming months.

## **Retail**

The Assembly would not wish to see consideration given to further out of centre retail development.

## **Culture and Tourism**

Given the significance of tourism in York, it might be helpful to reiterate the principles of sustainable tourism as set out in Draft RSS (Policy E6).

## **Community facilities**

It will be important to ensure that the location of any new community sports stadium does not undermine the broad locational principles set out in Policies YH1 to YH8 of Draft RSS. These build on and reinforce policies in current RSS.

## **Historic and Natural Environment**

The Assembly supports the principles outlined.

## **Sustainable Transport**

Effective demand management and support for alternative forms of transport to the car are clearly key issues for the City of York. The principles that are set out would support the implementation of the Regional Transport Strategy but it will be important to consider how spatial options can be developed that ensure that these principles will be adhered to.

## **Waste and Minerals**

It would be helpful to reflect the Regional Waste Management Objectives set out in Policy ENV12 of Draft RSS.

In relation to Aggregate and Non-Aggregate Minerals, Policy ENV4C of Draft RSS that minerals plans, programmes, strategies and decisions will 'demonstrate provision for extraction of sand and gravel based on the outcome of the 2<sup>nd</sup> phase of the Yorkshire and Humber Sand and Gravel Study'. It would be helpful for the Core Strategy to relate to this Study as it is developed.

## **Renewable Energy**

The Assembly will wish to see the targets for Renewable Energy generation that are quoted on page 107 incorporated into the Core Strategy.

I hope that these comments are helpful to you. 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.

Regards

A handwritten signature in blue ink, appearing to read 'Jenny Poxon', is positioned above the typed name and title.

Jenny Poxon  
Head of Planning Delivery and Conformity