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From: Sadler, Frances [frances.sadler@york.gov.uk]
Sent: 10 February 2012 10:22
To: ldf
Cc: Grainger, Martin
Subject: Selby District Council Submission Draft Core Strategy Further Consultation
Attachments: Selby Core Strategy CYC Comments.pdf

Please find attached City of York Council's comments on the Selby District Council Submission Draft Core Strategy Further Consultation

<<Selby Core Strategy CYC Comments.pdf>>

Kind regards,

Frances.

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City Strategy

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10 February 2012

Dear Mrs Gregory

**Selby District Council Submission Draft Core Strategy
Further Consultation (January 2012)**

Thank you for consulting City of York Council on the above document.

City of York Council is committed to working with Selby District Council on cross boundary issues as you progress your Local Development Framework.

The following are to be received as comments only, for your information and consideration and are not formal objections or representations.

The overall scale of housing development over the plan period

Whilst we welcome the additional work that has been undertaken to review the evidence base we have the following comments to make on the Scale of Housing Growth in Selby Final Report (November 2011 Arup):

- At section 4.3.2 'Forecast Economic Change in Surrounding Areas' in the second paragraph it states that '*York is projected to experience declining employment until 2022 with modest levels of growth to occur after this*'. This is also illustrated by Figure 4.1. Whilst this is not referenced, we can only assume that this is based upon the Regional Econometric Model. City of York Council do not accept the outcomes of this model, this is because it does not represent the economic growth forecasts for York as put forward in our Core Strategy, as underpinned by our Employment Topic Paper (2011) prepared by Arup and previous work undertaken by SQW and Entec.
- Section 4.4 'Conclusions' at the second bullet point states that '*there are questions as to the deliverability in the short term of the identified housing supply*

Director: Bill Woolley

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in some authorities (e.g. Leeds, York). We would refute this statement given the production of our housing trajectory and the approach to housing supply as set out in the 'Housing growth and Distribution' Section of our Core Strategy.

- Figure 5.3 of Section 5.2 'Completions' uses CLG housing completion figures which are inaccurate compared to City of York Council housing monitoring completions. In our Population Topic Paper (2011) undertaken by Arup we requested that CLG information was supplemented with our household completions monitored to provide a more accurate figure. There is a large disparity between the CLG completions figures and the RSS targets for York.
- At Section 6.1 'Overview' in the first paragraph it states that the latest household projections indicate demand is higher than the housing allocation in the RSS or average completion rate. It states that the situation is similar in authorities surrounding Selby, including York, Leeds, the East Riding and Harrogate, *'some of which have not identified suitable, available and achievable housing capacity.'* The latter part of this (in italics) is not the case for York as we have a suitable housing trajectory and also measures in place for flexibility should supply not materialise as predicted through the identification of areas of search for urban extensions.
- The first paragraph of Section 6.2.2 'Cross Boundary Issues' (also repeated in Background Paper No.14: Housing Scale and Distribution) states that *'Selby is part of a wider strategic housing market and there is potential for the under provision (in terms of planning and/ or actual delivery) of housing in parts of this wider area, particularly Harrogate, Leeds and York. This under provision is likely to increase pressures in the wider housing markets, including the Selby District.'* We would refute this as our evidence base (particularly the Population Topic Paper (2011) by Arup) supports our housing targets and is further supported by a Housing Context Paper. Central to this is York's influence on a sub-regional basis in terms of employment and housing targets which take this into consideration.

The strategic approach to Green Belt releases

We welcome the introduction of a new policy on Green Belt which seeks to protect the general extent of the Green Belt and control inappropriate development in the Green Belt. We recognise that it will be important to work with Selby District Council at such a time that a Green Belt review will be undertaken.

We hope the above comments are useful. We have no formal objections or representations to make.

Please do not hesitate to get in touch should you wish to discuss further.

Yours sincerely

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