

SELBY DISTRICT CORE STRATEGY

**THE IMPLICATIONS OF NPPF ON THE THREE
STRATEGIC MATTERS COMPRISING THE REASONS
FOR THE SUSPENSION OF THE EXAMINATION
IN SEPTEMBER 2011**

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The duty to co-operate

It remains unclear whether the duty to co-operate provided by the Localism Act applies in the case of Selby's Core Strategy since this was submitted prior to the Act receiving royal assent. Irrespective of this, NPPF is now a material consideration in the formulation of Core Strategy policy and clearly requires cross-boundary co-operation between Authorities on a range of issues of the provision of housing where there is evidence that housing market areas straddle administrative boundaries, and on the approach to green belt.

The general extent of the York Green Belt is established in regional spatial strategy as a belt with an outer boundary of about 6 miles from the city. This 6 miles limit is broadly consistent with the outer boundary of York's administrative area with a consequence that parts of the length of the outer boundary lie (just) within adjoining Authorities' areas and other parts lie (just) within the city. None of the detailed green belt boundaries (outer, inner or inset) within York has been approved since there is no adopted Development Plan for the city.

York has submitted its Core Strategy. An Exploratory meeting has been called by the Examination Inspector to investigate a number of concerns he has identified in the Core Strategy including procedural matters (legal compliance on Duty to Co-operate and the Sustainability Appraisal); the overall strategy and the amount of development, its distribution and its delivery across the City of York area with specific reference to residential and employment development, and to green belt issues.

A letter from the York Core Strategy Examination Programme Officer dated 12th March together with a summary of the Inspector's key concerns is attached which sets out these issues in more detail.

The lack of adequate provision for the development needs of the City is identified by a wide cross-section of objectors to the Core Strategy. The Executive Member for housing in York has recently been quoted in The Press as saying that 'arguably' the Core Strategy housing provision is inadequate.

It follows that *if*, as currently proposed by York, the inner edge of the green belt should be tightly drawn round the urban area then “decanting” some of York’s development requirements into adjoining Authorities by leap-frogging the green belt must be one option.

The only adjoining Authority with a Core Strategy in place is Hambleton District. That Core Strategy makes no provision to meet any of York’s development needs. There is no evidence that any meaningful discussions have taken place between the City of York and adjoining Authorities, including Selby, to investigate this option.

Similarly, there is no evidence of any meaningful discussion between Selby and Leeds to understand and agree the implications of potential cross-boundary movements between the western parts of Selby and Leeds.

The last Local Plan adopted for Selby (end-dated 2006) took a fundamentally different approach to housing distribution from its predecessor. The previous Local Plan provided very limited residential development in the western part of the District on the grounds that this would increase in-commuting to Leeds. In contrast, the last Local Plan made significant residential allocations in the western part of the District on the grounds that since commuting was inevitable, this could be reduced (in length) by locating new housing in Selby as close to Leeds as possible. This approach is continued to some extent in the Core Strategy by reason of the significant land allocations at Sherburn and will be exacerbated if “as the Council and some objectors propose “a proportion of Tadcaster’s housing requirement is “reallocated” to Sherburn or DSVs in the western part of the District.

At the very least, this seems to run counter to the Council’s objective of delivering a strategy of self containment as well as failing to provide housing commensurate with the needs of the different housing market areas within Selby.

Clear indications of the need for co-operation between Authorities is provided throughout NPPF, including:

- Paragraph 31 in relation to infrastructure. It is understood that, particularly in the western part of the District, there are instances of settlements within Selby being dependant on infrastructure provided outside the District.
- Paragraph 54 in relation to the provision of housing in rural areas.
- Paragraphs 83-85 in relation to the review of green belt boundaries (particularly relevant in the northern part of Selby District adjacent to York, as described earlier).
- Paragraph 97 in relation to formulating policies for the cumulative landscape and visual impacts of renewable energy development.
- Paragraph 117 in relation to planning for biodiversity at a landscape scale *across Local Authority boundaries*.
- Paragraph 157 in relation to the need for Local Plans *crucially* to be based on *co-operation with neighbouring Authorities.....*
- Paragraph 159 which requires Planning Authorities to work with neighbouring Authorities *where housing market areas cross administrative boundaries*.
- Paragraph 160 which, similarly, requires Planning Authorities to work with neighbouring Authorities in order to understand and plan for the needs of business.
- Paragraph 162 which requires infrastructure planning to be considered across administrative boundaries.
- Paragraph 166 which notes that development in one Local Authority area can have significant impacts on European wildlife sites which may lie within another Local Authority area.
- Paragraphs 178 ó 181 which sets out in some detail the Government's expectations for joint working between Authorities to ensure that strategic priorities are properly

co-ordinated and reflected in individual Local Plans. Attention is drawn specifically to the circumstances in which Authorities might agree how to meet development requirements which cannot entirely be met within their own areas.

The clear expectation of these paragraphs is that ó in simple terms ó it should be possible to put neighbouring Local Plans side by side and for them to fit together ó as in a jigsaw. This clearly will not happen in the northern part of Selby adjacent to York in respect of *at the very least* housing land provision and green belt.

- Paragraph 182 which identifies providing for *unmet requirements from neighbouring Authorities where it is reasonable to do so and consistent with achieving sustainable development* as a test of soundness of a Local Plan.

The Council's latest proposals to meet housing needs

The Council's current proposals ó to marginally increase the average annual housing requirement compared with that contained in the submission Core Strategy and to reduce the actual annual requirement in the early years of the Local Plan ó is based on work carried out following the September 2011 adjournment of the Examination by Arup.

It will be noted from the response of the City of York Council of 10th February 2012 to Selby's Further Consultation of January 2012 (attached) that York takes issue with Arup's conclusions which are based in part on assumptions about future economic growth in York . This assumption is not shared by the City Council who cite work carried out for them also by Arup which reaches different conclusions.¹

Also attached is a recent newspaper article (of 12th April 2012) regarding new business start-ups in York, which suggests the City's economy is more robust than Arup, working for Selby, have assumed.

¹ CYC's letter of 10th February 2012 was prepared before the York Examination Inspector's Summary of his Key Concerns which casts significant doubt on those parts of CYC's letter which assert that York's Core Strategy makes adequate provision for housing

Housing distribution

NPPF (para 159) makes it clear that Local Planning Authorities should have a *clear understanding* of housing needs in their area and should be alive to the implications of housing market areas which cross administrative boundaries ó in Selby's case, Selby/York and Selby/Leeds. The same paragraph also differentiates between housing *needs* (first bullet point), and housing *demand*, making it clear that plans should cater for *housing demand and the scale of housing supply necessary to meet this demand*. It is clear from this paragraph that Planning Authorities are now required not only to meet statistically calculated housing requirements but also to take into account where people want to live. This will inevitably put further pressure on those areas within Selby lying in close proximity to York.

We have commented earlier that it is inappropriate to òredistributeö part of Tadcaster's housing requirement to Sherburn or DSVs in the western part of the District since those settlements serve a different housing market area from Tadcaster.

In considering distribution and the comments of representatives to the Core Strategy, it is interesting to note that almost all are based outside Selby District, predominantly in Leeds and that their comments are confined almost exclusively to Selby (Town) and areas to the west of the River Ouse. The area to the east of the Ouse which is predominantly a rural area, receives scant consideration. The exception to this is the response prepared by Ward Associates of January 2012 which describes the rural characteristics of large parts of Selby District and the importance of maintaining an adequate supply of housing in the designated service villages. The author of this document, Richard Borrowes, was for many years Chief Planning Officer to Selby District Council and is well placed to comment on the characteristics of the District in the round. He describes the proposed increase in the allocation to designated service villages (71 dwellings to be distributed over 17 communities during the Plan period) as *misery* ó a conclusion with which we find it difficult to disagree.

16th April 2012

City of York Core Strategy Examination

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Inspector: David Vickery DipT&CP
MRTPI

Date: 12 March 2012

Dear Ms Hubbard

City of York Core Strategy Examination: Notice of Exploratory Meeting

I am writing to you as you have made representations on the City of York Core Strategy and to inform you of an Exploratory Meeting on Monday 23 April 2012. The appointed Inspector is David Vickery, DipT&CP MRTPI, who will conduct the Examination in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 to determine whether the Strategy is sound and legally compliant, and he will submit a report on this to the City of York.

I have been appointed as the Programme Officer for the Examination and will deal with all procedural, administrative and programming matters under the direction of the Inspector. I shall be happy to answer any questions you have about the administration of the Examination, though I must point out that I am not allowed to discuss the details of your representations with you.

The Inspector has undertaken a preliminary assessment of the Core Strategy and other submitted material and he has identified a number of significant concerns relating to the soundness and legal compliance of the document. Therefore, in order to inform the way forward for the Examination, the Inspector has called an Exploratory Meeting. This will take place at 14.00 hours (2pm) on Monday 23 April 2012 at the Friends Meeting House, Lower Friargate, York YO1 9RL.

The purpose of the meeting is to clarify how best to proceed with the Examination in the light of the Inspector's initial concerns. The Council will be given the opportunity to provide clarification and to suggest how the Inspector's concerns may be addressed, possibly through changes to the submitted Core Strategy and/or additional work being undertaken. The Council and other participants will be asked to indicate how they consider the Examination should proceed.

The Inspector's main concerns are set out in the attached note (Annex 1), to which he has invited the Council to reply. An agenda is attached as Annex 2. More details about the purpose of an Exploratory Meeting and the possible outcomes from such a meeting are explained in section 9 on page 32 of the Planning Inspectorate's publication "*Examining Development Plan Documents: Procedure Guidance*" of August 2009. This can be found at:

http://www.planningportal.gov.uk/uploads/pins/dpd_procedure_guide.pdf

All those who made representations on the Core Strategy are being notified of the meeting, which will be open to the public. However, there will not be a discussion of the merits of the Core Strategy as such and the meeting will not replace the hearing sessions, which would take place later should the Examination proceed. It is at these later hearing sessions that those who made representations on the Core Strategy would have the opportunity to present their views, and where the soundness and legal compliance of the Core Strategy would be tested.

No further representations from you are required since views on the soundness of the plan have already been submitted in response to the original public consultation. Some planning policy changes by the National Policy Planning Framework are likely to be announced soon by the Government and, assuming that the Examination proceeds, the Inspector will be asking all respondents for their views on these later.

I will contact you again when it is known if and when the Examination will progress, but this will probably not be known until after the meeting. The Inspector's Preliminary Questions to the Council and its replies, any response from the Council on the Inspector's concerns, and a note of the meeting are and will be published on the Council's web site:

<http://www.york.gov.uk/environment/Planning/ldf/corestrategy/Examination/>

Should you wish to attend the Exploratory Meeting, I would be grateful if you would let me know by Wednesday 11 April 2012 in order that I can estimate and provide for the number of people attending. A map showing the location of the Friends Meeting House is viewable by the web link below, as are details of nearby car parks and public transport:

<http://g.co/maps/d72jh>

http://www.york.gov.uk/transport/Parking/Car_parks/

http://www.york.gov.uk/transport/Public_transport/

If you have any mobility problems or require assistance of any kind, please let me know. Please do not hesitate to contact me if you have any queries.

Yours sincerely,

Bob Lancaster

Examination into the City of York Core Strategy

Exploratory Meeting at 14.00 hours (2pm) on Monday 23 April 2012

Summary of the Inspector's Key Concerns

I have asked the Council to respond to these concerns before the Exploratory Meeting (see web site) and to give me a timetable for any extra work considered necessary.

Introduction

1. From my initial reading of the submitted Core Strategy (the CS) and supporting documents I have some significant concerns regarding its compliance with the legal requirements and its potential soundness.
2. This is not an exhaustive list of all potential matters of soundness - there are a number of other issues that will need to be addressed should the Examination progress. A comprehensive list of matters and issues will be set out in due course if the Examination continues. I have asked the Council a series of Preliminary Questions, some of which relate to my concerns here, and these can be seen on the Council's web site.
3. I have not at this point reached a definite conclusion that the CS is unsound, either on the specific points set out in this note or in terms of other matters. This meeting does not mean that I have failed to appreciate the hard work that has gone into the CS. But before progressing to arranging hearing sessions these key concerns merit further discussion.
4. My concerns are set out below and they are either legal compliance matters or soundness issues concerning **what** will be delivered; **where** it will be delivered; **when** it will be delivered; and **how** it will be delivered through the CS and other subsequent Plans and Documents.

Legal Compliance - Duty to Co-operate and the Sustainability Appraisal

Duty to Co-operate

5. Amended section 20(7B) of the 2004 Act establishes that the duty to co-operate imposed by amended section 33A is incapable of modification by me at this Examination. Therefore, this is one of the first things that I have to examine because if the legal requirement is not fulfilled then I have no choice other than to recommend non-adoption of the CS.
6. Document CD23 provides information on this duty, but it is 'broad brush' and deals primarily with the very early stages of initiating the overall co-ordination of wide ranging strategic policy across the various sub-regions of which the City of York forms a part. It does not address the relevant questions about the 'local' strategic impact of the CS itself on its immediate neighbours in terms of its allocations, policy implications, and its infrastructure and infrastructure requirements – or vice versa (i.e. the impact of neighbouring Plans on the City of York). The duty is about strategic planning in the context of localism.

7. The Council has said it will produce a further Supporting Paper on how it has satisfied the legal duty to co-operate during the preparation of the CS, and I will consider this before making any further judgement on this matter.

Sustainability Appraisal

8. The Council will be aware of the various court cases on Sustainability Appraisals (SA) of Plans, including that at Forest Heath and the recent case involving the Joint Greater Norwich Core Strategy. The judge in that last case said that "*the need for outline reasons for the selection of the alternatives dealt with at the various stages*" of a Plan's preparation has to be addressed in the final SA of that Plan.

Forest Heath: <http://www.bailii.org/ew/cases/EWHC/Admin/2011/606.html> (see in particular paragraphs 15 to 17 and 40).

The Greater Norwich judgement of 24 and 29 February 2012 is not yet available on the Bailii web site. The Court upheld one of the grounds of challenge in finding that the local planning authorities there had not complied with the requirements of the Strategic Environmental Assessment regime because they had not properly considered alternative options that did not rely on significant housing growth in one part of the plan area. The Court ordered that the housing strategy for the Broadland District be reconsidered.

9. Thus, the final SA here has to outline the reasons why the various alternatives previously canvassed are still not as good as the proposals now being put forward in the CS. So far as I can see, the final SA (CD3) does not undertake this assessment adequately in its section 4, although the SA is missing its Annex 3 and it might be that this missing Annex may do this.
10. The Preferred Options SA (CS15) considers options and alternatives in its section 4, but I have difficulty in understanding from that why particular alternatives were not chosen in preference to others that were. The text appears to be a generalised discussion of the options, concentrating on the proposed policies performance against SA objectives, without clear conclusions as to which overall alternative strategy should be pursued. The same is true of the Issue and Options 2 SA (CS6). Moreover, I am not convinced that the options selected are reasonable policy alternatives.
11. At submission I became the joint SA authority with the Council, and this joint responsibility continues until my final report is issued. However, the Council will become the competent authority on adoption and so it will have to deal with any resulting s113 challenge under the 2004 Act. Is the Council satisfied that the SA accompanying the draft plan (the submission CS) adequately gives reasons, or summarises or repeats the reasons that were previously given, for rejecting any reasonable alternatives, and that those reasons if given previously are still valid?

The overall strategy and the amount of development, its distribution, and its delivery across the City of York area

12. The CS is the place to make key decisions about the distribution of development and to set out clear guidance for the allocation of sites in future Plans. The strategy for the amount and distribution of development needs to be clear and based on a robust justification. It also needs to be realistically deliverable. I am concerned that this may not be the case with the submitted CS.

Appropriate strategy

13. In order to be sound, the CS has to be justified using proportionate evidence to show that it is the most appropriate strategy when considered against the

reasonable alternatives. For the reasons set out above on my SA concerns, I am not convinced that the overall strategy is, in fact, the most appropriate as I cannot identify what reasonable alternatives were considered and why they were rejected.

Residential development

14. Policy CS6 identifies around 12,270 dwellings out of the 16,000 proposed during the plan period. This leaves some 3,730 dwellings for which the CS does not specify a geographical location, which it should do as a vital strategic matter.
15. The CS takes account of windfalls in the first 10 years of the plan period, which Government policy says should not be done unless compelling evidence of genuine local circumstances that prevent specific sites being identified is provided. This has not been done. Correcting this would increase the numbers of unidentified dwellings by some 1,400 to around 5,130 dwellings.
16. It is clear from the above that the Areas of Search are likely to be used to accommodate most of the 5,130 dwellings in the longer term. The shortfall is so large that the CS has to take this hard, strategic decision now – it cannot rely on the hope that windfalls or other brownfield sites will take up a shortfall of such a large extent. Key sites which are critical to the delivery of the housing strategy over the plan period must be identified in the CS. But I can find no evidence on the potential capacity of these Areas of Search, or even on their likely area for housing. And they are not assessed in the SHLAA.
17. I am aware that some representors believe the Council has under-allocated in terms of housing numbers, and that the proposed densities in policy CS9 are too high. If the Examination shows these to be justified concerns, then any necessary increase in housing numbers or relaxation in housing densities would exacerbate the above situation.
18. There is no housing trajectory in the CS, and that in the evidence base (CD13) is unclear about how and when all the required housing will be accommodated in the plan period, especially during its end period.
19. There is no information on whether the CS has identified specific deliverable sites sufficient to provide five years worth of housing against the housing requirements, and a supply of specific, developable sites or broad locations for growth for the next two five year periods (15 years in total), as required by Government policy.
20. I am not confident that the evidence shows that the larger villages in the settlement hierarchy can accommodate 13% of the new housing over the plan period. The CS does not say how this would be split up between the villages.
21. Policies CS3 and CS4 leave the detail of the York Central and British Sugar/Manor School strategic allocations to supplementary planning documents (SPDs). The sites are too large, too complex and, most importantly, the level of detail in the CS is too sparse on what goes where and when for this to be left to SPDs. They should each be guided by an AAP, like the City Centre (policy CS2), and the CS policies need more detailing.

Employment development

22. Policy CS16 sets out the strategy for the development of employment land. Irrespective of whether the amount chosen is right or wrong for York's regional role (which is for the Examination to debate), the CS does not provide any detail on the amount of land needed to be allocated to meet the chosen target; is not totally clear on where it will be located; and does not say when or how it will be delivered. There is no proper analysis in the CS of need balanced against committed sites and

allocated sites, by site and over time – that is, there is no ‘employment land trajectory’. This major question cannot be avoided.

23. Document CD14 sets out some of this missing information, the relevant parts of which should be in the CS. But it also shows that the analysis does not cover the whole plan period (only to 2029, and that with some uncertainty), and that there is a large over-supply in B1 (a) offices and B1 (b) research and development. The CS does not say what the implications of this over-supply might be (for instance, on housing numbers and the sub-regional economy of nearby Districts), nor what it intends to do (if anything) about it. Again, the CS must answer these obvious strategic questions.
24. The Area of Search C (Northminster) is left in the CS as a possible development but the figures in CD14 seem to indicate that it is not needed during the plan period. That begs the question as to why the CS even mentions it and tentatively suggests its allocation, especially as it lies in the Green Belt.

Community facilities development

25. Policy CS11 and paragraph 11.7 identify the need for a new swimming pool and a community stadium. These are key strategic land use decisions which need to be taken in the CS, but the policy fails to identify where, when or how these facilities will be provided. Similarly for a new fire station mentioned in policy CS12 and paragraph 11.11. There are other new strategic sports facilities mentioned in the evidence base which might also be required during the plan period, such as a measured closed circuit cycling facility to accommodate training and competitive events, and these are not dealt with in the CS, which they should be.

Waste and Minerals

26. The CS does not seem to deal adequately with the strategic issues of waste disposal. How and where will waste be disposed of or otherwise treated or handled? Is any of this cross-boundary? In particular, what is planned for Commercial and Industrial Waste and for Construction, Demolition and Excavation Waste? No clear strategic guidance is given to whatever ‘the appropriate DPD’ is that will handle these matters, nor is there any timescale for that DPD.
27. What minerals will actually be required during the plan period? Is coalbed methane required? What mineral reserves are there and where? What should be done to safeguard them? Are Minerals Safeguarding Areas or ‘landbanks’ required? Are sites for future mineral working needed and identified? Where are the criteria-based policies against which planning applications for mineral working will be considered and specific sites will be allocated? Is it necessary to include policies to safeguard existing and potential storage, handling and processing facilities for the bulk transport of minerals? What monitoring targets are therefore necessary? These basic questions are not answered. No clear strategic guidance is given to whatever ‘the appropriate DPD’ is that will handle these matters, nor is there any timescale for that DPD.

Deliverable and so effective

28. To be effective (a soundness criteria) the CS should be deliverable over its period. In a number of cases there appear to be significant infrastructure or remediation costs associated, for instance, with the strategic allocations for new development (e.g. two rail bridges for York Central). The Council’s Infrastructure Delivery Plan (CD9) is generalised and deals with infrastructure by function across the whole of the plan period and not by allocated site. The infrastructure policy (CS25) does not assist – indeed it says that critical elements of infrastructure have not been considered – and there are some expensive road schemes mentioned in CS18

which are to be funded by developments (paragraph 15.9). It is not at all clear which infrastructure requirements are needed to be completed before each proposed development site can proceed.

29. The CS does not provide any information about the financial viability of any of the key sites, particularly the strategic allocations or the Areas of Search. Given the apparent reliance on these locations to provide a significant proportion of housing, and possibly employment development, it is not clear that the spatial strategy is realistically deliverable.
30. To enable the CS to be deliverable, the sites and the amount of development identified in it should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. There appear to be a large number of different costs in the CS likely to be applied to development, such as requirements for affordable housing, education and training, road schemes, open space, green infrastructure, air quality, renewable energy, sustainable construction and drainage, and other infrastructure contributions such as those in paragraph 22.3. I have not seen any evidence which shows that development would be deliverable when taking account of these additional costs requirements together with the normal cost of development and on-site mitigation. Would there still be acceptable returns to a willing land owner and willing developer?
31. I am concerned that there is no overall assessment of viability which justifies the affordable housing or renewable energy and sustainable construction policies (policies CS10 and CS21 respectively). As an aside on policy CS21, I have not yet located the evidence (it does not appear to be in LD19) which gives the local justification for requiring developments to have renewable energy and sustainable construction targets which are in advance of those set by Parliament for the country as a whole. If it is in the evidence base please can it can be pointed out to me - or it can be provided later.
32. Given the uncertainty about development viability, the contingency 'risk' planning in the CS is inadequate. I am concerned that the CS does not give a clear indication of what it would do if a vital infrastructure project or a requirement necessary to develop a site was cancelled or delayed. For instance, what happens if one or more of the strategic allocations cannot be delivered on time or at all?

The Green Belt and Areas of Search

33. As the Areas of Search are key sites which are critical to the delivery of the housing and (possibly) the employment strategy in the later part of the plan period, they need to be identified now and removed from the policy CS1 Green Belt, thus setting boundaries which will endure beyond the plan period. Leaving such important strategic decisions to a lower level Plan will lead to confusion and uncertainty. The Areas cannot just be 'safeguarded land' outside the Green Belt because some of it is clearly needed for development within the plan period. On the other hand, I am not convinced that sufficient work has been undertaken to enable a proper decision to be made on the exact choice and boundaries of the Areas.

Supplementary Planning Documents

34. Supplementary planning documents should only be necessary where their production can help to bring forward sustainable development at an accelerated rate, and must not be used to add to the financial burdens on development. It would seem that many of the proposed SPDs in the CS are, in fact to be used to add to the financial burden of developments.
35. Moreover, as I have already mentioned, many of the policies in the CS have been inappropriately devolved down to SPDs. Many of them appear to be deliberately

designed to avoid the independent examination of policies that would significantly affect development in the City of York area. And many of them seem to be used to avoid taking the difficult, crucial, strategic decisions that should be decided now in the CS.



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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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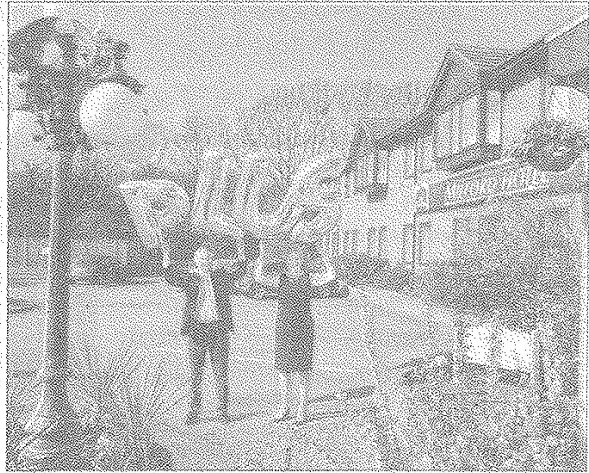
THE BEST Western Milford Hotel has been awarded Plus status after completing a £500,000 facelift.

The hotel, in South Milford, near Selby, has renovated all 44 rooms, including four-star luxury bathroom suites and upgraded ten larger superior rooms to deluxe status.

The five-year project included air conditioning and sound-proofing in all rooms, a new hotel frontage, upgraded modern conference facilities and fully refurbishing the hotel's Watermill restaurant.

Best Western launched its Best Western Plus and Best Western Premier tiers in September 2011. Shaun Sleath, managing director and owner of the Best Western Milford Hotel said: "We are delighted to be one of the first hotels worldwide to be awarded the Plus status. It is a great testament to the ongoing investment, hard work, dedication and determination of the team here."

"Thanks to our five-year improvement programme, we now have superior facilities and it is an honour to be rewarded with this prestigious Best Western title."



PRESTIGIOUS: Shaun and Jane Sleath, owners of Best Western Milford Plus Hotel, who have invested more than £500,000 to upgrade its facilities

York is booming with business start-ups

by **JULIE HAYS**

Business editor

YORK has increased its rate of business start-ups quicker than every other area in North and West Yorkshire, new research has found.

The research, conducted by Leeds University Business School, showed York's start-up figures increased by 38.8 per cent since the recession started in 2008. This is the highest change recorded across North and West Yorkshire.

In 2011, 1,693 businesses were set up in York, that's 11 businesses per 10,000 members of the working age population. This is up from eight in 2008, according to BankSearch database records of new business bank accounts.

The most new businesses were set up in the professional services sector, with 1,943 over the four-year period, including 532 in 2011.

Many new businesses were in tourism, with more than 180 new businesses started in the accommodation and food service sector in 2011, compared to 75

in 2008, a 141 per cent increase, with 481 businesses setting up between 2008 and 2011.

Between 2008 and 2011, business starts in the agriculture, hunting and forestry sector were up 175 per cent, the manufacturing sector was up 102 per cent.

York's business start-up rate in 2011 was ahead of Leeds, which set up ten businesses per 10,000 members of the working-age population and Bradford at 10.8. North Yorkshire fared well in general with Scarborough scoring 11, Ryedale 12.7, Harrogate 14.6, Selby 13.2 and Hambleton 12.9.

Katie Stewart, head of economic devel-

opment at City of York Council, said the council was focusing on increasing the number of start-ups that go on to be VAT-registered businesses.

In 2010, 665 businesses were VAT-registered, which was up on 570 in 2009, but down on 2008, when 735 businesses were VAT-registered.

She said: "On the one hand, this data is good news, showing a healthy increase in enterprise in the city; on the other hand, the city still lags in VAT registrations. The difference between starts and VAT registrations suggests that there is a gap between those early stage start-ups growing to reach the next rung of the ladder."

Main sectors for business start-ups

	2008-2011	2011
Real estate, professional services and support activities	1943	532
Recreational, personal and community service	1225	274
Wholesale and retail trade	700	215
Construction	621	167
Manufacturing	231	85
Agriculture, hunting and forestry	105	44
Total businesses set up	5,893	1,693