

From: Rachel Wigginton [Rachel.Wigginton@northyorks.gov.uk]
Sent: 09 September 2016 14:28
To: localplan@york.gov.uk
Cc: Grainger, Martin; Carl Bunnage; David Bowe; Matt O'Neill
Subject: RE: Cty of York Local Plan Preferred Site Consultation
Attachments: Final NYCC response CYC Preferred sites.docx

Dear Martin

Thank you for consulting North Yorkshire County Council on the above document. Our comments are attached.

Kind regards

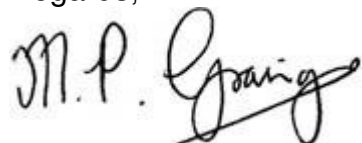
Rachel Wigginton

Rachel Wigginton
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 Strategic Policy and Economic Growth
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Tel: 01609 532428
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From: [REDACTED] **On Behalf Of** localplan@york.gov.uk
Sent: 15 July 2016 11:06
Subject: Cty of York Local Plan Preferred Site Consultation

Dear Sir/Madam,
 I am writing to inform you about the opportunity to comment on the 'Local Plan – Preferred Sites (2016)' document.
 The consultation period runs from Monday 18th July until 5pm on Monday 12th September 2016.
 Please see attached letter for more details.
 Regards,



Martin Grainger
 Head of Planning and Environmental Management

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North Yorkshire County Council.

Your ref:

Tel: 01609 532428

Our ref:

Fax:

Contact: Rachel Wigginton

Email: Rachel.wigginton@northyorks.gov.uk

Date: 9th September 2016

Web: www.northyorks.gov.uk

Dear Mr Grainger

CITY OF YORK LOCAL PLAN

PREFERRED SITES CONSULTATION

Thank you for consulting North Yorkshire County Council on the City of York emerging Local Plan Preferred Sites Consultation and supporting documents. This is a corporate response of the County Council, agreed with Executive Members and takes account of representations received from across all relevant Directorates.

The County Council recognises the strategic importance of York getting an adopted Local Plan in place and that this is a commitment in the LEP's Growth Deal with Government. We therefore remain very keen to see that York adopts a sound and credible local plan as soon as possible. At the same time we fully understand the difficulty of steering a course between the aims of conserving York's historic environment, meeting the City's housing and employment needs and enhancing York's strategic role in the sub-region. We remain keen to engage and support the City Council in developing the plan over the coming months against a backdrop of continuing close working between the two Authorities and in line with the requirements of the Duty to Cooperate.

We recognise that this is primarily a consultation on a package of sites. We are raising no significant concerns in relation to specific site allocations apart from the comments relating to York Central below, and subject to further consultation when transport, viability and other evidence is available.

We do, however, have some concerns at this stage about the direction of the Local Plan, particularly in relation to the level of ambition in the Plan and to its cumulative inflexibility, both of which we consider could present risks to it being found sound at examination.

The consultation documents contain revised housing and employment targets, based on updated evidence, and a different approach to Green Belt boundaries and safeguarded land from the

Martin Grainger
Head of Planning and Environmental Management

Preferred Options Local Plan. We consider that it is important that the County Council makes comments on these significant changes now to allow for further discussion, rather than wait for consultation on the full revised strategy in the Publication Draft, which is the last consultation stage, in early 2017.

Our comments are as follows:

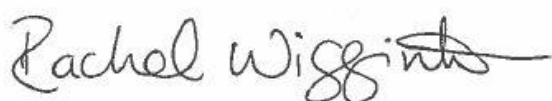
1. We are disappointed that the Local Plan is not more ambitious in its approach to growth. We accept that the employment case is justified and argued coherently in the context of the current economic position in York and overall the employment land review is detailed and robust. We note, however, that the review does not allow for a more ambitious approach to growth in employment, reflecting the current aspirations of the Local Enterprise Partnership and its partners, the Strategic Economic Plan or indeed those of the Northern Powerhouse. It is not clear how the Plan could accommodate flexibly higher levels of economic growth, should the economy perform more strongly than anticipated. A more positive position in respect of employment growth would ensure that York is able to play a more proportionate role in the development of the regional economy and has scope to fully exploit opportunities created by upcoming national infrastructure projects such as HS2 and the City's own aspirations to develop new service industry jobs including digital and communications industries. Higher growth might also help fund major infrastructure in the City, such as the outer ring road improvements, which would benefit the wider sub region and we need to look at the viability evidence when it is available in this respect. York has potential to be a key player in the future of the sub region and the Local Plan needs to be sufficiently flexible to plan for growth now and in the next plan period.
2. We note that the reduced housing target of 841 dwellings per annum would seem to equate closely to a "policy-off" figure with what appears to be little uplift for planned employment growth or in relation to true market signals. Whilst we note that this is supported by the latest SHMA, our main concern at this stage is that there is little flexibility in the proposed housing and employment land supply to accommodate the possibility of higher economic and housing growth in this and the next plan period, including as a result of national investments through the Northern Powerhouse. There appear to be a number of risk factors that might cumulatively present soundness issues, including the dependence of projected housing numbers in the consultation document on achieving higher density development than in the Preferred Options Local Plan, and a reliance on delivery of sites with complex delivery issues, particularly in advance of viability evidence, and on delivery of windfall housing on small sites at historic levels.
3. The County Council is concerned that the City's approach to defining the inner Green Belt boundary which is being established for the first time in this Local Plan, will further reduce the Local Plan's flexibility. The Preferred Options Local Plan set a boundary that included 270 ha of potential housing land and 71 ha of employment land safeguarded for development for 10 years after the end of the plan period. The current document proposes a tight Green Belt with no safeguarded land and relies instead on the allocated sites providing sufficient capacity for just 5 years beyond the plan period. We are concerned that that this approach will not provide a boundary that is sufficiently enduring and that the absence of safeguarded land could increase the risk of there being insufficient land for development outside the Green Belt post 2032. Bearing in mind that Government guidance states that Green Belt boundaries should only be altered in 'exceptional circumstances', without a supply of safeguarded land, York may have difficult choices to make in the next local plan and without more flexibility there is a risk that the City might be unable to provide for its long-term housing needs. This could result in increased out migration to/in-

commuting from North Yorkshire in the longer term which would need to be planned with neighbouring authorities, including the County Council, through the duty to co-operate.

4. Whilst the County Council is very supportive of the development of the York Central site, we have some concerns about the reliance of the Local Plan on achieving housing and business development on this site at the planned rate, particularly in advance of viability evidence. The assumed housing densities are relatively high and York needs to be certain that this and other housing sites in the Local Plan meet the aspirations of potential occupants; otherwise there will be increased pressure on housing developments in adjoining districts in North Yorkshire and the East Riding of Yorkshire. The Plan is also very reliant on the new business district meeting the City's longer term economic needs.
5. Further consultation on sites will be needed when transport evidence is complete in October to enable discussions with the North Yorkshire Highway Authority on the implications of the sites selected, particularly in relation to the A59.
6. There are no comments from other County Council service areas at this stage.

Thank you again for consulting North Yorkshire County Council. Our service areas are happy to meet with you over the next few months to continue to discuss the Local Plan and supporting evidence, including the issues we have identified in these comments.

Yours sincerely

A handwritten signature in black ink that reads "Rachel Wigginton". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rachel Wigginton
Senior Policy Officer