

## **Annex A**

### **City of York Council response to the Call for Evidence – approved by Executive on 7<sup>th</sup> October 2008**

#### **The Housing Challenge The Yorkshire and Humber Plan – 2009 Update Call for Evidence**

##### **4.1 Thinking about the four strategic approaches for accommodating growth, please tell us about your preferred approach**

The City of York Council supports the current strategy in the recently adopted RSS (Your Approach 1 – Maintaining the Current Strategy). We support the approach as set out in Leeds City Region and York sub areas and we accepted the higher housing numbers (850 pa) subject to a number of caveats (see response to 6.1 below). The current strategy concentrates development on the main towns and cities in the region but in the case of the York sub area also recognises the strong functional linkages York has with its surrounding hinterland and in particular Malton and Selby, with York providing employment opportunities for people across North Yorkshire and the East Ridings. Seeing York within a wider 'sub area' is the correct approach.

The other three options put forward are not necessarily incompatible with the current RSS strategy and the correct strategy may be a combination of these strategic approaches. It depends on the particular circumstances of each location and sub area and the level of growth to be accommodated.

For instance, Approach 4 (Growth Points and Growth Areas) could, in the case of the Leeds City Region New Growth Points submission, help to prioritise re-use of brownfield land such as York Northwest.

Approach 2 (Major Urban Expansions) involves significantly growing some existing settlements. This may be appropriate in some parts of the region and would have the benefits of continuing the focus on existing towns and cities. However in some cities, such as York, where environmental constraints are great (see evidence base documents submitted alongside this) and there is a need to protect the historic character and setting of the city (with one of its features being its compactness) then this approach is unlikely to be appropriate. Our two recent major urban extensions at Derwenthorpe and Germany Beck add up to 1200 units. The example of 10,000 homes at Cambridge East is clearly of an altogether different scale. If something of that scale was required for the York sub area then a different spatial approach to major urban expansions would need to be considered. Our SHLAA and Employment Land Reviews (which will be completed in September) will give an idea

of how much housing can be accommodated in the urban area on previously developed or previously used/allocated employment land.

Approach 3 (New Settlements). There may be scope for an appropriately located new settlement somewhere in the region. The Leeds City Region leaders have clearly rejected the idea of a new settlement in Selby but there is a proposal in South Yorkshire. The idea of a tightly drawn Green Belt boundary that protects the character and setting of York was one recommended by the Inspector who presided over the public inquiry into the York Green Belt Local Plan. This was to be supported by a new settlement beyond the York Green Belt but that was never taken forward. Depending on the scale of development the York sub area had to take this could be an option, although a stronger role for Selby and Malton, which are well connected to York in public transport terms, may be more suitable.

## **5.1 Are there particular areas or locations in the Region where this strategic approach should be applied ?**

The spatial approach/es to be taken depend on the particular characteristics of a sub area, the key opportunities and constraints facing each key settlement within it , and the scale of growth to be accommodated. For example limited urban extensions may be accommodated without impacting on the character and setting of York. But significant urban expansion of York, of the scale given in the Cambridge example, could not be accommodated taking into account known environmental constraints and the need to protect the character and setting of York through its Green Belt.

## **6.1 More information about how the region might best accommodate growth.**

In our response to the Proposed Changes to the recently adopted RSS we expressed concerns about the ability of the City to absorb the additional numbers (up from 640 to 850 per annum in the proposed changes) but recognised the higher household projections since the Draft RSS (in 2005) and the market demand/need identified in our recent Strategic Housing Market Assessment (2007). However we said that additional growth must be conditional on two key things:-

- 1) A recognition of the important role that brownfield Windfalls will play in future housing land provision. They have been a key element of our provision in York over the last 10 years and some account must be allowed for them over the longer period of the RSS to 2026. Without this it will lead to unnecessary release of greenfield land, counter to the Core Policies of the RSS.
- 2) Substantial assistance with infrastructure costs being made available through national and regional sources. Without this extra funding, then the significantly increased growth will lead to serious traffic congestion in what is already a physically constrained historic city. The step change in growth

needs to be matched by a step change in infrastructure provision to support it, otherwise sustainable development will not be achieved.

The City of York Council's views on these two key issues are equally, if not more important, when applied to the higher housing figures now being considered at the regional level through the 2009 Update of RSS. How windfalls and infrastructure are treated in the Update are critical considerations if the strategy is to be deliverable and in a way that does not undermine the current focus on urban regeneration and effective use of brownfield land.

A proper understanding of the opportunities and constraints in each area should be used to inform the sub area approaches. We have a significant evidence base of documents prepared to support the draft Local Plan and York LDF. I attach a list of relevant documents for your information (see Annex 1). We would encourage joint working at the earliest opportunity, particularly in relation to how housing growth in the York sub area is to be considered, and the transport and infrastructure implications of different options.

Given the current state of the housing market the 2009 Update should give careful consideration to not just the numbers but deliverability issues including affordable housing, phasing and brownfield first.

Finally it is important that any assumptions about housing growth are based on realistic assumptions about economic growth. We objected to the 2130 per anum figure for York in adopted RSS and the policy does talk about the importance of taking local employment land reviews and forecasts into account. Our own ELR modelling shows 1060 new jobs per anum to be more realistic and would still deliver sustained economic growth. It is important these are used when considering different housing growth scenarios for the 2009 Update.