

Local Development Framework Working Group

6th April 2009

LDF Core Strategy - Spatial Strategy for Consultation

Briefing Note

Summary

Members of the LDF Working Group will be considering a draft Spatial Strategy for York at tonight's meeting. This briefing note explains the key principles behind our approach:

- maximizing urban potential;
- minimizing the need for greenfield land; and
- avoiding areas of highest green belt value in order to protect the historic character and setting of York.

It then considers the statutory nature of the RSS and LDF and highlights the importance of achieving a 'sound plan', based on firm evidence, which is in general conformity with the Regional Spatial Strategy. It summarises the 'gap in provision' in meeting RSS requirements, from our evidence base to date. It then considers the alternative ways of 'bridging' that gap. It concludes that the taking of some land out of the draft green belt will be necessary if our Spatial Strategy and Core Strategy is to be found sound.

The Spatial Strategy – a key element of the LDF Core Strategy

The Spatial Strategy will be a key element of the LDF Core Strategy, a key document in York's LDF, to which all other documents must conform. The LDF and the adopted RSS together will form part of the Statutory Development Plan for York. The Core Strategy will be subject to public consultation in May when the issue of how we plan for our future development needs can be considered by the residents of York and other key interested parties.

The Key principles behind our approach

Work on the Spatial Strategy has been based on a number of key principles:

- focusing development on the York urban area (in accordance with RSS);
- maximising use of brownfield land;
- achieving higher densities;
- providing the right mix and type of housing;
- avoiding the areas of highest green belt value (a primary constraint)
- avoiding areas of flooding and nature conservation interest (primary constraints).

The Report before you tonight sets out a proposed Spatial Strategy for meeting future development needs set by RSS but in a way that protects the historic character and setting of York. It identifies areas of search for potential future urban extensions based on the extensive evidence base and avoiding the primary constraints identified above. These urban extensions will not be needed until 2021 at the earliest and much later if windfalls come forward at past rates.

The Regional Spatial Strategy and 'General Conformity'

The statutory Development Plan for York will be made up of the Regional Spatial Strategy (formally adopted in 2008) and the Local Development Framework (when adopted in 2010). The adopted RSS has set a housing requirement for York of 640 units per year from 2004 to 2008 and 850 units per year to 2026. These are minimum targets that must be achieved in

the LDF. The LDF to be proved sound after independent public examination will need to show that it is in 'general conformity' with the adopted RSS. RSS is currently under review but that is in the context of seeking even higher levels of housing growth. Whilst the Council responded to consultation by stating that now was fundamentally the wrong time to review RSS, no decision has been taken to abort this process. The RSS Review public examination is scheduled to take place in early 2010 if the review process continues. Guidance is clear that we must work to the current adopted RSS.

As it stands, the York LDF will need to be in "general conformity" with the adopted RSS. The housing figures in the Spatial Strategy Paper are based on the housing requirements in the current RSS. If the RSS Review continues there is a good possibility that local authorities will be asked to take even higher levels of housing growth, given that the latest 2006 based population and household projections show even higher levels of growth than the 2004 based projections on which the currently adopted RSS was based.

Meeting York's housing requirements - the gap in provision

The report to the LDFWG on the SHLAA identified a gap in provision in the order of 6,500 units to 2030 taking all known sites in the SHLAA into account. The SHLAA report made it clear that York has a draft Green Belt. Only the general extent (the outer boundaries) have been formally set in any statutory plan. The inner Green Belt boundary for York has not been formally set to date - that is the role of the York LDF. We made it clear in the report that any decisions on housing sites in the draft Green Belt would have to be made using a plan-led approach through the Core Strategy and the subsequent Allocations plan.

Bridging the gap

We have considered all opportunities for 'bridging the gap':

- **including 'windfalls' in the plan** - we have reviewed all the guidance, taken advice from the Planning Inspectorate, and considered how other authorities have approached this. Our clear view is that to include windfalls in the plan before 2025 would lead to an 'unsound' plan. Including them after 2025 is a risk and may be challenged but we at least think there is an argument to make given York's plan needs to run longer in order to set a long term green belt boundary.
- **raising densities** - our calculations are based on reasonably high density assumptions including 30% of supply being made up by flatted development (based on the HMA recommendations) and density assumptions for housing in the suburban areas being 40 dwellings per hectare (based on Derwenthorpe and Gemany Beck densities). To bridge the gap just using higher densities would require all our sites to be 100% flatted development. This is clearly not a realistic option given our clear evidence base requiring a mix of house types and government policy on providing family homes (as set out in PPS3).
- **Seeking a lower housing requirement after 2026** - the current RSS only runs to 2026. To plan to 2030 for York we have projected forward the RSS requirement of 850 homes per year. The housing figure for York in the RSS already represents a policy of relative restraint – the 850 homes being less than the average number of new households (1050) projected in York each year (from 2026- 2030) in the 2004 based household projections. The 2006 based household projections on which the RSS Review will be guided are even higher. It is the clear officer view that such an argument could not be sustained.

Conclusion

The officer view is that the gap cannot be bridged and that land for potential future urban extensions needs to be identified. The Spatial Strategy we are presenting tonight meets the city's development needs whilst protecting the historic character and setting of the city. It achieves this by maximising our urban potential (the majority of our provision will be on brownfield land but will still achieve the ratio of houses to flats set out in the Strategic Housing

Market Assessment), and avoiding areas of highest green Belt value. The Spatial Strategy we are proposing has sought to minimise the need for greenfield land take.