



City of York

LDF | Local
Development
Framework

Duty to Co-operate Supporting Paper

April 2012

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1.0 Introduction

- 1.1 The City of York Council has a long history of joint working and co-operation with its neighbouring authorities and key stakeholders to achieve better spatial planning outcomes. The Core Strategy is no exception. On-going and constructive engagement with neighbouring authorities and relevant organisations has taken place since work on the Core Strategy began in 2004. It is important to note that this not only occurred locally between the City of York Council and individual neighbouring authorities and organisations but also as part of wider planning arrangements at sub-regional and regional levels, including the Leeds City Region which the Council has been an active Member of since 2004 and partners in the North Yorkshire and York Sub Region through Local Government North Yorkshire and York.
- 1.2 The Core Strategy Submission (Publication) (2011) was prepared in line with Government guidance in Planning Policy Statement 12 and the Council's Local Development Scheme, prior to new requirements of a Duty to Co-operate being established in the Localism Act and National Planning Policy Framework (NPPF). However, the Core Strategy will be tested against these new requirements. The Inspector will consider, alongside legal compliance and soundness, whether the Council has complied with the new duty to co-operate throughout the plan-making process.
- 1.3 This paper is a retrospective analysis of whether the arrangements for joint working in place between 2004 and 2011 satisfy the current requirements of the Duty to Co-operate. As well as being a Member of the Leeds City Region Partnership the Council is currently the secretariat for wider sub-regional spatial planning and transport arrangements in the North Yorkshire and York Sub Region. Along with the wider authorities of the Leeds City Region, North Yorkshire Sub Region and East Riding, the City of York Council will help to shape new arrangements for planning in the legal context of the Duty in the future.

2.0 The Purpose of the Paper

- 2.1 The Localism Act requires that local planning authorities demonstrate wider co-operation in plan making with adjoining or nearby authorities and other organisations in relation to cross boundary issues. The Planning Inspectorate has indicated that this requirement must be satisfied when the Core Strategy is submitted to the Secretary of State for examination and cannot be remedied through the examination process.
- 2.2 The Council provided evidence relevant to the Duty to Co-operate when it submitted the Core Strategy on 14 February 2012 through the following papers:
 - Supporting Paper 6: Strategic Spatial Context and Co-operation (**CD23**);
 - Planning Advisory Service Self-assessment Legal Compliance and Soundness Tool (**CD20**);
 - Consultation Statement (Regulation 30 (1) (d)) (**CD8**); and
 - Consultation Statement (Regulation 30 (1) (e)) (**CD19**).

- 2.3 The Inspector wrote to the Council in March 2012 setting out some areas where he had concerns around the submission Core Strategy. This included addressing the Duty to Co-operate and the Inspector noted that Supporting Paper 6 (**CD23**) “does not address the relevant questions about the 'local' strategic impact of the Core Strategy 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.”
- 2.4 This paper seeks to address the concerns of the Inspector. It draws on the evidence highlighted under paragraph 2.2 above and should be read alongside Supporting Paper 6 (**CD23**), which remains in the Council’s opinion, a valid reflection of past and future working arrangements on strategic planning issues. It does not intend to replicate the information from these documents. It covers the following:
- the context to the Duty to Co-operate;
 - the process of co-operation undertaken in preparing the Core Strategy, this includes the outcomes of joint working that has influenced the plan;
 - the identification of key local strategic issues for the City of York Council Core Strategy, setting out how the plan aligns with neighbouring authorities plans; and
 - contemporary and future methods of co-operation.

3.0 Context

The Localism Act

- 3.1 Section 110 of the Localism Act transposes the Duty to Co-operate into the Planning and Compulsory Purchase Act 2004 and introduces section 33a, which sets out a duty to co-operate in relation to the planning of sustainable development (“the Duty”). The Duty applies to all local planning authorities, county councils and ‘prescribed bodies’ and requires that they must co-operate with each other in maximising the effectiveness with which development plan documents are prepared. The Localism Act states that in particular the Duty requires that engagement should occur constructively, actively and on an on-going basis during the plan-making process and that regard must be given to the activities of other authorities where these are relevant to the local planning authority in question. For York this comprises the authorities of Ryedale, Selby, Harrogate, Hambleton and the East Riding, as well as recognising wider strategic issues at the Leeds City Region and North Yorkshire and York Sub Region levels.
- 3.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the prescribed bodies for the purposes of implementing section 33a(i) of the 2004 Act. Of those listed in the regulations it is considered that the following bodies are most relevant to the City of York Council:
- the Environment Agency,
 - the Historic Buildings and Monuments Commission for England (known as English Heritage),
 - Natural England,

- the Civil Aviation Authority,
- the Homes and Communities Agency,
- the Office of Rail Regulation,
- the Primary Care Trust; and
- the Highway Agency.

3.3 The Local Enterprise Partnership (LEP) is also included as a prescribed body although as part of a separate clause 33a(ix). For York this includes the York, North Yorkshire and East Riding LEP and the Leeds City Region LEP. It should be noted, as illustrated at Annex 1, that both LEPs are intrinsically linked with the wider, ongoing governance structures.

The National Planning Policy Framework

3.4 The NPPF (2012) sets out further details on how the provisions of the Localism Act should be implemented. It states that public bodies should:

- co-operate on planning issues that cross administrative boundaries, particularly those that relate to strategic priorities including the homes and jobs needed in an area, the provision for retail, leisure, commercial development, a wide range of infrastructure provision, climate change mitigation as well as adaptation and conservation of the natural and historic environment, including landscape;
- undertake joint working on areas of common interest for the mutual benefit of neighbouring authorities;
- work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans;
- consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans;
- take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should co-operate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable economic growth in consultation with Local Enterprise Partnerships and Local Nature Partnerships Authorities should also work collaboratively with private sector bodies, utility and infrastructure providers; and
- demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Co-operation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the infrastructure necessary to support current and projected future levels of development.

3.5 Two tests of soundness in the NPPF relate directly to the Duty as follows:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development; and
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Requirements of the Duty to Co-operate

3.6 Government guidance on the Duty has not been provided but the Planning Advisory Service (PAS) has released advice on its web-site as to the implementation of the Duty. This guidance is useful in helping to establish arrangements for strategic planning work and deliver positive outcomes and it contains ten golden rules for strategic planning which assist in setting up working arrangements in the absence of regional plan making. However the PAS guidance does not consider how the Duty to Co-operate may be applied retrospectively to a process where much of the co-operation between authorities and prescribed bodies was done under the auspices of the Regional Spatial Strategy (RSS).

3.7 The Council considers that the requirements of the Duty can be split into two main components: the process of co-operation and the outcomes of co-operation. The Council therefore considers that there is a need to demonstrate two things:

- that it has striven to co-operate with neighbouring authorities and prescribed bodies i.e. that constructive engagement has occurred, actively and on an on-going basis in line with section 33a of the Planning Act 2004. In other words the process of co-operation, covered in Section 4.0 of this paper; and
- that the basis and results of this co-operation have been positively prepared and are effective i.e. that the relevant cross-boundary issues have been identified and addressed within the Core Strategy, in line with the National Planning Policy Framework. In other words the outcomes of co-operation, covered in Section 5.0.

4.0 Process of Co-operation

4.1 Given the wider national and regional changes outside the control of the City Council, the approaches to co-operation have changed throughout the preparation of the plan. Table 1 overleaf shows the changing but ongoing methods of co-operation that the City of York Council has been engaged in whilst preparing the Core Strategy.

Table 1: Changing methods of co-operation through the Core Strategy plan-making process

Dates	Vehicle for Co-operation	Role of City of York Council
Pre-2004	North Yorkshire and York Structure Plan	Co-production of document with North Yorkshire County Council, Local Authorities and National Park Authorities
Pre-2004	North Yorkshire Local Plan Forum	Active Member
2003-2012	Yorkshire and Humber Plan (Regional Spatial Strategy to 2026) <ul style="list-style-type: none"> • Set a core approach and targets for local authorities. • Identified sub area and cross-boundary issues. 	Active Member of the North Yorkshire and York Technical Forum which established a sub-regional consensus on strategic cross boundary issues and collectively lobbied the Regional Assembly
2004-present day	Leeds City Region Partnership: <ul style="list-style-type: none"> • Agreed a Concordat which outlined a shared vision and the principles of how local authorities would work together • Agreed the City Region Development Programme which developed the Partnership's vision into actions • Leaders board set up to take strategic decisions 	Active Member
2004-present day	North Yorkshire Development Plan Forum	Active Member
2010-2011	North Yorkshire and York Sub-Regional Strategy: <ul style="list-style-type: none"> • Maintained core approach and sub area approach of RSS. 	Secretariat of North Yorkshire and York Spatial Planning Board and technical officer group
2010-2011	Leeds City Region Partnership: <ul style="list-style-type: none"> • Interim Planning Strategy which retains core approach of RSS. 	Active Member
2011 – present day	Leeds City Region Local Enterprise Partnership	Board Member
2011 – present day	York, North Yorkshire and East Riding Local Enterprise Partnership	Board Member
2011 – present day	York Sub Area Joint Infrastructure Working Forum	After initiating the setting up of this group, City of York council is now an active member.
2012	Duty to Co-operate	Secretariat of North Yorkshire and York Spatial Planning Board and technical officer group and Member of the Leeds City Region Partnership.

4.2 Further detail relating to the nature of this co-operation is provided in Supporting Paper 6 **(CD23)**. In addition to the more formal structures summarised above in Table 1, City of York Council has actively engaged with neighbouring authorities and bodies as highlighted in the Consultation Statement (Regulation 30(1)(d)) **(CD8)** and Consultation Statement (Regulation 30(1)(e)) **(CD19)**. Key aspects of this engagement through the consultation process are set later in this section.

The RSS Process

4.3 It is important to recognise the collaborative working that was undertaken as part of the RSS process as it relates to York and neighbouring authorities. This is because its key approaches continue to underpin emerging development plans and existing plans in the functional sub area. It provided the vehicle for consideration of cross boundary strategic issues and identifying suitable policy approaches to address them. Annex 2 provides a summary of the collaborative working undertaken between the City of York Council and its neighbouring authorities through the RSS process and sets out the specific cross boundary approaches that were championed by the City of York. This joint working essentially ensured an alignment of local strategic spatial approaches. Policy Y1 'York sub area policy' is included at Annex 3 for information and sets out the main local strategic issues from the RSS for the City of York and its hinterland. This section of the RSS was a part of the development plan for York until the RSS is revoked and the Core Strategy has, up until this stage, avoided repeating the strategic framework contained within it. The main local strategic planning issues for York identified through the RSS plan making process are set out below:

- the functional nature of the York sub area identified in the RSS in terms of housing markets, labour markets, travel to work and services, retail and service catchments;
- particularly strong connections between York and Malton on the A64 and eastern Trans Pennine rail route and with Selby along A19, although, as with York itself, Selby has important economic, social and housing market links with the urban heartland of the Leeds City Region;
- the need to improve accessibility within the City of York Council and between places within the sub area, especially East Riding where public transport accessibility is poor;
- developing complementary roles of Malton and Selby as service centres;
- restraint to the north and east of York where local needs only would be supported so as to diversify local economies but avoid excessive commuting e.g. Easingwold in Hambleton District Council;
- striking the right balance between planning for economic growth, the housing and services required to support it and safeguarding the special historic character of York itself; and
- addressing flood risk within wider catchments and seeking upstream management measures e.g. land management in upland areas.

4.4 These matters, derived through extensive consultation and joint working on the RSS, form the strategic basis of the Core Strategy Submission (Publication) (2011) **(CD1)** as well as the plans of neighbouring authorities. They remain relevant and important today. Section 5.0 expands on this, providing further detail on the local strategic issues that have shaped our Core Strategy.

Joint Working Outcomes

4.5 City of York Council has been involved in extensive collaborative joint working with its neighbouring authorities on a range of documents to support the strategies identified in Table 1 and to address specific strategic issues. The following documents, covering a broad range of issues, have influenced our work during the preparation of the Core Strategy:

- Regional Settlement Study (2004);
- The Yorkshire and Humber Plan (the RSS) (2008);
- North Yorkshire Gypsy and Traveller Accommodation Assessment (2008);
- North Yorkshire Accommodation Requirements of Showmen (2009);
- Effective demand for Market Housing Study (2010);
- Leeds City Region Housing Investment Plan (2010);
- North Yorkshire and Strategic Housing Market Assessment (2011);
- York and North Yorkshire Economic Assessment (2010);
- Realising the Potential: The Leeds City Region Local Enterprise Partnership Plan (2011);
- Leeds City Region Interim Strategy Statement (2011);
- Local Government North Yorkshire And York Sub Regional Strategy (2011);
- Leeds City Region Transport Strategy (2009)
- Let's talk less Rubbish: A municipal waste management strategy for the City of York and North Yorkshire (2006);
- Allerton Park Waste PFI Joint planning application for York and North Yorkshire (2011);
- Yorkshire and Humber Region Sand and Gravel resources and environmental assets (2004);
- Sub-regional Renewable Energy Assessment and Targets Study (2004);
- Delivering Sustainable Energy in North Yorkshire (2005);
- North Yorkshire and York Primary Care Trust and City of York Council Joint Strategic Needs Assessment (2008);
- Natural England Green Infrastructure Study (2009); and
- Leeds City Region Green Infrastructure Strategy (2010).

Consultation during the plan preparation process

4.6 Within this context extensive collaborative joint working has been undertaken in producing the Core Strategy. This includes ongoing consultation at all stages of plan preparation with neighbouring local authorities, prescribed bodies, specific consultation bodies and a wide range of interested parties. The Consultation Statement (Regulation 30(1)(d)) (**CD8**) and Consultation Statement (Regulation 30(1)(e)) (**CD 19**) set out who was consulted, how they were consulted and how any representations received were taken into account to shape the preferred strategy approach. A summary table has been prepared, drawing out representations from neighbouring authorities and prescribed bodies. In the interest of providing the Inspector with a succinct note it has not been included but can be provided upon request.

- 4.7 As set out in Consultation Statement (Regulation 30 (1) (d)) **(CD8)** and its annexes, neighbouring authorities and prescribed bodies were sent a letter/email and supporting documentation informing them of the opportunity to comment on the Core Strategy at Issues and Options 1 and 2 and at the preferred options stage of plan preparation. Targeted consultation was undertaken at the Issues and Options stage through meetings with specific consultees to enable more in-depth discussions. This included Natural England, the Environment Agency, English Heritage, the Highways Agency and the North Yorkshire and York Primary Care Trust. Regular updates on our Core Strategy were undertaken with neighbouring authorities through the North Yorkshire Development Plan Forum. At the Preferred Options stage further targeted consultation was undertaken through meetings with Natural England, English Heritage and the Environment Agency, alongside ongoing meetings with the Highways Agency to discuss their response to the Core Strategy. Meetings with neighbouring authorities were also undertaken to explore cross boundary issues.
- 4.8 At the Submission (Publication) stage of plan preparation the Core Strategy was published for consultation to allow interested parties to make representations on its legal compliance and soundness. All neighbourhood authorities and prescribed bodies were sent a letter/email informing them of the opportunity to comment as set out in the Consultation Statement (Regulation 30 (1)(e)) **(CD19)**. In order to maximise understanding of the approach in the Core Strategy, the Council contacted key consultees and neighbouring authorities and invited them to meetings with officers to discuss the approach and answer any questions before representations were submitted. Meetings were undertaken with the Environment Agency, English Heritage, the Highways Agency and neighbouring authorities. Natural England was offered such an opportunity to attend a meeting however due to circumstances it was not possible for such a meeting to take place.
- 4.9 During the preparation of the Infrastructure Delivery Plan **(CD9)** it was important to undertake consultation with infrastructure providers to make them aware of the levels and locations of development emerging through the LDF and to identify any implications for strategic infrastructure. An essential element of consulting with providers was to identify whether there were any critical pieces of infrastructure that would be unlikely to be deliverable, for example due to physical or financial constraints. The following prescribed bodies were identified as key infrastructure partners; the Highways agency, the Environment Agency and the North Yorkshire and York Primary Care Trust. Over and above the general Core Strategy consultation more specific consultation took place with the above bodies. A number of meetings with these bodies have taken place to explore issues relevant to their infrastructure type. At the Core Strategy Preferred Options stage, delivery partners, including the above prescribed bodies were sent an infrastructure consultation paper, which included specific questions on infrastructure requirements (see Annex 2 of the Infrastructure Delivery Plan **(CD9)**).

5.0 The Key Local Strategic Issues

- 5.1 This section sets out what the key local strategic issues for York, how they have been addressed in the City of York Council Core Strategy and how our Core Strategy aligns with those of neighbouring authorities. It also highlights the response from neighbouring authorities and prescribed bodies in relation to strategic issues.

Through the process of plan preparation and engagement the main cross boundary strategic priorities identified for York are considered to be the homes and jobs needed in the area alongside the provision of retail and infrastructure and climate change and environmental considerations it is these policy areas where the key local strategic issues lie.

The homes needed in the area

Strategic Approach

- 5.2 Following extensive cross-boundary partnership working on the RSS the main urban area was established as the focus for housing growth. All local authorities in the York sub area were supportive of the settlement hierarchy, location of development, distribution and levels of housing approaches in the RSS. This has shaped both Hambleton District Council's and Harrogate Borough Council's adopted Core Strategies¹ and remains the overall strategic approach for the emerging Ryedale, Selby and East Riding Core Strategies.
- 5.3 The housing markets of York stretch beyond its boundaries and are influenced by York's economic success with people commuting into the city to access jobs. There are especially strong relationships between the Leeds, York and Harrogate housing markets that together form a 'Golden Triangle' of high demand and higher than average house prices. This resulted in the establishment of a Golden Triangle Partnership to help deliver affordable housing².
- 5.4 High demand for homes from in-migration and an ageing population coupled with high quality of place is an issue that the City of York Council and many of its neighbouring authorities in the sub area have had to face. City of York Council and its neighbouring authorities (with the exception of Hambleton District Council) have also experienced, and continue to experience, significant rates of population growth over the past two decades. The local authorities worked together with the Regional Assembly to respond to these growth pressures and devised a model which distributed growth amongst the region, transforming older industrial urban areas and managing growth in more sensitive high demand areas like York. This was subject to local influence and shaping through "reality checking" around constraints and opportunities. In the York sub area there was agreement among local authorities that the RSS contained an appropriate distribution of development.
- 5.5 It is important to note that through the RSS process:

¹ Hambleton's Core Strategy was adopted in 2007 and Harrogate's Core Strategy was adopted in 2009

² This was a partnership between housing and planning professionals within City of York Council, Leeds City Council and Harrogate Borough Council, Home Housing Association and York Housing Association. The former Housing Corporation, former Government Office for Yorkshire and the Humber and former Yorkshire Forward acted in an advisory capacity to the partnership until they were abolished. The Partnership was created in 2003 and operated until 2011 when funding ceased.

- the distribution of development was influenced by the roles of places in the region, which were established by the Regional Settlement Study (2004) completed by Yorkshire and Humber Regional Assembly;
- the RSS process considered the distribution and levels of development within the individual local authorities of the York sub area rather than across the sub area - whilst distribution of development across the sub area was explored, technical challenge with regards to disaggregating the available data meant it was not possible;
- local authorities played a key role in evidencing both the strategic capacity of places to accommodate development, understanding previous rates of delivery and the opportunities that development would bring, especially in terms of affordable housing;
- most local authorities in the York Sub area pointed to environmental and historic environment constraints that affected their ability to deliver high levels of growth;
- while there was recognition that the housing markets of York overlap with those of its neighbours there were and remain no local calls to quantify this; and
- no local authority raised the issue of unmet housing requirements in a neighbouring local authority within the York sub area.

5.6 Following the announcement that the Regional Strategy would be revoked the City of York Council took the opportunity to revisit housing requirements and in December 2010 the Council's Executive took the decision to reduce the proposed housing requirement to 575 homes per annum. This led to a concern being expressed that it could have put pressure on neighbouring authorities to provide for unmet needs. In June 2011 following up to date evidence and work undertaken by Arup consultants the Council took the decision to raise the figure to an average of 800 homes per annum, broadly fitting with the previous RSS figure for York.

5.7 The RSS housing targets, which had been agreed through the RSS process and endorsed by the Planning Inspectorate, were used as a starting point for the work undertaken by Arup in their Population Topic Paper (**LD12**) which explored housing need in York. Further testing was necessary in light of changes to household projections which saw increases in all neighbouring authorities apart from Hambleton District Council. The testing considered the key elements set out in Planning Policy Statement 3 as well as looking at the impacts of the recent recession and the ability of the market to deliver new housing. This work also examined the City of York's housing need alongside the needs of neighbouring authorities.

5.8 This objective approach to identifying housing numbers was supported by work undertaken on the North Yorkshire Strategic Housing Market Assessment (2011) (SHMA). Consultants GVA who undertook the North Yorkshire SHMA were asked as part of their brief to address housing market overlaps. The outcomes of this work did not indicate any need to review the housing figure established for York through the Core Strategy.

5.9 All authorities provide for fewer homes than their CLG household projections (apart from Hambleton District Council). This has been a policy decision, maintained by the

City of York Council and its neighbouring authorities, following the longstanding approach in the region to redistribute growth towards the main urban areas and a recognition of the constraints (see Annex 2 for more information). It should be noted that CLG are currently revisiting their household projections.

Strategic Issues

- 5.10 The plans within the York Sub area have been prepared against a context of changing (and largely increasing) population projections coupled with the current economic climate which has affected the rates of delivery of new homes. It is the Council's view, and that of many of the neighbouring authorities who have reassessed their housing requirements, that whilst an increase in housing supply is needed it remains to be seen whether the market can and will deliver significantly higher rates of housing.
- 5.11 Work undertaken as part of the RSS process potentially underplayed York's strong cross boundary relationships with the East Riding. Efforts have been made recently to redress this not least through the inclusion of the East Riding in the York Sub area Study, the presence of East Riding officers on North Yorkshire and York planning officer groups and Council consider that a formal Member representation on the North Yorkshire and York Spatial Planning Board in line with the wider links being established through the LEP should be supported. This is one particular issue where the Duty and new working arrangements will come into play.

The Core Strategy Approach

- 5.12 In meeting the area's future housing need, development will be concentrated in York's main urban area. This will include a significant contribution from the area covered by the York Northwest Strategic Allocations which are a priority for investment in the Leeds City Region Housing Investment Plan (2010). Provision will be made for 16,000 dwellings between 2011 and 2031 with the delivery of an average of 635 dwellings per year between 2011/12 and 2015/16, increasing to 855 dwellings per year between 2016/17 and 2030/31. To ensure supply in the latter part of the plan period potential sustainable extensions to the main built up area could be brought forward should they be required to meet the city's needs. It is also highlighted that residential development must respond to an understanding of local housing needs, this includes the provision of high quality housing options for those who cannot afford market housing.
- 5.13 The evidence base work to date, as discussed above identifies unmet needs only in so far as it relates to unmet levels of affordable housing. Meeting affordable housing needs fully within the York sub area is considered by all local authorities to be unrealistic and unachievable under current planning mechanisms given the levels required which in some cases would require that 100% of all future housing provision be affordable.
- 5.14 With regard to the issue of Gypsies and Travellers the Council worked as part of the North Yorkshire Gypsy and Traveller Partnership to evidence cross boundary need for Gypsies, Travellers and Showpeople. City of York Council's approach aims to deliver identified sites to meet evidenced need.

Consultation Responses from Neighbouring Authorities and Prescribed Bodies

- 5.15 Ryedale District Council welcomed the housing targets and noted that delivery is increased after 2015-16 reflecting the state of the economy and need to step up delivery of housing. Hambleton District Council did not object to the Core Strategy but expressed some concern about flexibility of planning for York to ensure that long term development needs can be met, without adversely impacting on neighbouring parts of Hambleton District lying outside Green Belt. East Riding of Yorkshire noted that it is important that housing and employment growth are balanced and seek to reduce (or at least not exacerbate) levels of commuting from neighbouring authorities. Selby District Council welcomed the further work undertaken to review evidence on targets in particular consideration of RSS targets and more recent CLG projections however they expressed some concern that if York is being over cautious leading to under provision in the plan period this will lead to pressure on Selby.
- 5.16 North Yorkshire County Council considered that the document is likely to enable the Council to accommodate its full housing needs throughout the plan period. They considered that the Council should identify 'safeguarded' areas of land within the proposed Green Belt for future housing development through the Allocations DPD. The County Council supports the proposal to take account of windfall sites which is a significant issue for all authorities in North Yorkshire where windfall sites traditionally represent a major element of new housing growth. It was suggested that excluding them can result in significant over-allocation of land, which can distort the overall strategy.
- 5.17 The Highways Authority consider that the York Northwest Strategic Allocations will have a significant impact on the Strategic Road Network and as such they would like to be involved in future analysis of sites to ensure that potential cumulative impact of sites is fully analysed at later stages. At the preferred options stage English Heritage questioned the potential impact of development on the historic character and setting of the city. However at the Submission stage their concerns had been addressed and they support the approach.

Approaches of Neighbouring Authorities

- 5.18 The RSS distribution and levels of development remain unaltered in the adopted Core Strategies of Hambleton and Harrogate and have been reassessed in the context of the 2008-based household projections in Selby, Ryedale and East Riding. These assessments have resulted in housing figures remaining broadly in line with the RSS for, Ryedale and Selby while in East Riding³ there has been potentially some increase in line with a proportionately significant increase in household projections.
- 5.19 The East Riding of Yorkshire identifies a Vale of York Sub area in their emerging Core Strategy which has two main towns, Market Weighton and Pocklington identified as a Local Services centres. These form part of the settlement hierarchy

³ It should be noted that East Riding provides for housing arising from the main urban area of the City of Kingston upon Hull but that relationship, subject to a separate Duty to Co-operate, is not seen to affect the policies of the City of York plan.

which will be the focus for housing development. However, it is noted that because of its links to York it is generally an area of high housing demand and as such, the policy approach for this sub area focuses on supporting economic growth to reduce out-commuting (from the sub are) and improve the overall sustainability of the area.

- 5.20 The emerging Ryedale Plan identifies that Malton and Norton as the Principal Towns in Ryedale perform a local and wider strategic role within the York sub area. The plan also notes that the proposed annual housing target reflects the annual rate of delivery which was established by the RSS. Through that process, this target was supported by robust evidence and in the context of more recent evidence, including household projections. Ryedale District Council considers that it remains an appropriate level of housing provision which balances the need to accommodate objectively assessed requirements with local aspirations, issues and constraints. In a sub-regional context, it is a target which will help to manage externally driven demand for housing in Ryedale and reflect relationships with neighbouring authorities. This is particularly important given the close proximity of the City Of York with its high demand housing market. For Selby in its emerging Core Strategy reinforcing the role of Selby locally as well as sub-regionally is sought by providing a focus for housing in the town.
- 5.21 The adopted Harrogate Core Strategy focuses most of its development for housing within the towns of Harrogate and Knaresborough and recognises that due to the rail link between Leeds/Harrogate/York many residents leave the Borough to work in York. Whilst the adopted Hambleton Core Strategy focuses housing development on the Principal Towns of Northallerton and Thirsk and identifies an area of restraint to the south of the District. This includes the local service centre of Easingwold which otherwise would face development pressure due to its proximity and ease of access to York.
- 5.22 It is noted that all neighbouring authorities propose to provide for the needs of Gypsies, Travellers and Show People.

Commentary

- 5.23 The Council considers that the City of York delivers sufficient homes to address needs arising in the local authority area and the approach set out in our Core Strategy Submission document does not contradict neighbouring authorities approaches to housing. There is an acknowledged overlapping housing market between York and its neighbouring authorities as would be expected from a city with a tightly drawn unitary boundary and functional hinterland. This has resulted in recognition from all surrounding local authorities of the roles of different places in relation to York. In Harrogate and Hambleton the areas immediately adjoining the City of York are not a focus for housing growth. In Ryedale and Selby the Principal Towns, by virtue of their economic relationship and transport connections to York, do serve a wider than local role, but both authorities in their Core Strategies are seeking to create a more robust economic and service base which affords the opportunity for people to live and work more locally.

The jobs needed in the area

Strategic Approach

- 5.24 The City of York is the focus for a functional, economic sub area that stretches beyond its authority boundaries. The status of the City of York as an economic driver was established through the RSS process by virtue of the designation of the City as a 'Sub-Regional City' where sub-regional economic growth should be focussed so as to make best use of competitive advantage, local and wider links with other firms and sectors and to provide links to the knowledge-bases in the region which are focussed on the main cities.
- 5.25 The RSS also set out, in Policy Y1 'York Sub area Policy' (see Annex 3), that the hinterland of York plays a critical complementary role in supporting sub area and local objectives. In this way the RSS identified that secondary locations are critical to the success of the York sub area economy and identified in particular a role for Malton/Norton and Selby. Selby's proximity to the south of York, especially York Science Park and the research base at the University of York, along with a track record in power generation and supply, availability of land and industrial premises means that it is well placed to provide for local and wider economic growth and links, particularly around the low carbon economy.
- 5.26 The sub area approach of the RSS has been retained in recent economic analysis undertaken by the York and North Yorkshire Partnership Unit⁴. The analysis of economic linkages provided the economic assessment with a view of economic geographies across the sub region. It was concluded that these economic geographies do not follow administrative boundaries but do have distinctive characteristics both physically and economically making them a good spatial basis for this assessment. These are based on the spatial areas set out within the RSS and through discussions with the local authorities and include York and Hinterland i.e. the York Sub area. Within the York Sub area only 1% more residents are in employment than jobs in the area. This shows a high level of 'self containment' within the sub area.
- 5.27 Whilst York has experienced the impact of the recent recession, as a whole the City remains in a strong position to fulfil its role as a sub-regional economic driver with links beyond its boundaries.

Strategic Issues

- 5.28 The City of York authority area has a significant level of daily in-commuting (See Supporting Paper 5: The Relationship Between Housing, Employment and commuting **(CD28)**), as befits a sub-regional centre. This leads to pressure on public transport and the road network. The challenge is to build on the economic success of York whilst reflecting constraints, this includes maintaining and diversifying the economic growth of the City in a manner which is complementary to the places around York included in within the wider sub area.
- 5.29 The places around York benefit from proximity to the City as an economic hub, as a knowledge centre and as a location for wider sectoral and cross sector supply

⁴ York and North Yorkshire Economic Assessment (2010) York and North Yorkshire Partnership Unit

chains. Key sectors include high value sectors such as financial and business services, alongside growing bioscience, creative industries, and IT and digital services and tourism, retail and construction. However, the local authorities around York recognise that they need to maintain a strong local economic base.

The Core Strategy Approach

- 5.30 The LDF will ensure that York fulfils its role as a key driver in the regional economy and that employment levels remain high. To this end, the creation of up to 1,000 new jobs a year is a key target. Providing sufficient land in the right locations to allow the economy to realise its potential whilst respecting the City's special historic and natural environment will be fundamental to supporting growth and deliver increased prosperity. To ensure sustainable economic growth the LDF will focus economic development in the city centre and other sustainable locations. This will include a new office quarter within the York Central Strategic Allocation. Land adjacent to the existing Northminster Business Park has been identified to be brought forward if required to ensure a continuous supply of sites to the city's needs. Existing employment sites and areas will also be protected.
- 5.31 Science City York, York Science Park and expansion of the University of York have encouraged knowledge-led industries to locate and expand their operations in the city. This is supported within the Core Strategy. In addition business clusters which have developed at York Science Park (Bioscience, Cultural & Creative, IT & Digital) are beginning to have spin-off benefits for other locations both within and outside the City of York area for example the Food and Environment Research Agency in Ryedale.

Consultation Responses from Neighbouring Authorities and Prescribed Bodies

- 5.32 East Riding considered that it important to clarify that housing and employment growth in city are balanced and seek to reduce (or at least not exacerbate) level of commuting from neighbouring authorities. English Heritage welcomes the recognition that economic success must be delivered in a way which respects City's unique character. The Highways Authority consider that York Northwest will have a significant impact on the Strategic Road Network and as such they would like to be involved in future analysis of sites to ensure that potential cumulative impact of sites is fully analysed at later stages. It is anticipated that this could done as part of the work on the Allocations and Designations DPD.

Approaches of Neighbouring Authorities

- 5.33 The emerging Ryedale Plan notes that it is important for Malton/Norton to play a more strategic role both for the District and in terms of their relationship with the City of York. The aim is to capitalise on the proximity to York's successful economy in order to try and stimulate economic links and the growth of specific sectors in Ryedale such as science/knowledge based activity. The strategy is not to compete with the City of York but to provide for those businesses that need good links to York and attractive surroundings but which do not require a location in the City itself. The approach represents a good opportunity to diversify the economy of the Principal Town and in doing so to create wider economic benefits and employment choices for Ryedale as a whole.

- 5.34 The Emerging East Riding strategy includes supporting economic growth in the area immediately to the east of York so as to reduce out-commuting and improve the overall sustainability of the area. For Hambleton District's centres of employment in Northallerton and Thirsk are some way from the City of York and serve different markets. The main links are with Easingwold and this is defined in their Core Strategy as a local service centre which provides for local job opportunities only. However the Adopted Core Strategy does recognise that Easingwold will benefit from being within the "sphere of influence" of York.
- 5.35 Harrogate recognises that while there are some functional employment links with the City of York the main relationship is with Leeds and so their plan focuses on wider cross boundary links with the Leeds City Region. Harrogate identifies Boroughbridge, Green Hammerton and Tockwith (the closest settlements to York) as local service centres which may grow to serve local economic needs in their immediate rural areas. The policies in the York Core Strategy do not impinge on these roles. Northminster Business Park is the closest employment site (along with Area of Search C) to Harrogate District but its growth is not considered to substantially displace potential employment growth from the Harrogate area.
- 5.36 The emerging Selby Core Strategy notes that as a result of a high level of out-commuting to Leeds and York, the District to a degree has become a dormitory location for these cities, supplying them with skilled labour, at the expense of the local economy and sustainable development objectives. It therefore seeks to reduce out-commuting to York and strengthen the economic base of Selby Town in particular. It considers that that Selby is well placed to benefit from overspill of highly skilled, knowledge and technology based forms of employment from other parts of the Leeds City Region, and York.

Commentary

- 5.37 The Council considers that the role of the City of York is as a driver of the sub-region's and the sub area's economy. The RSS set in place a framework of complementary roles where spin-offs from the York economy could be spread so as to benefit places like Selby. This is maintained in both the York Core Strategy and the development plans of neighbouring authorities. The location of employment land in York is very much concerned with fostering and enhancing the economic base that already exists e.g. in the City Centre, at the University and existing business areas. These will not lead, through virtue of their location, to additional competition with neighbouring authorities and accessibility between places outside the City of York.
- 5.38 Some concern has been raised by East Riding of Yorkshire that the job growth and housing growth of the City needs to be balanced. However it is considered that the approach taken by the City of York Council is appropriately balanced in light of the conclusions of Supporting Paper 5: The Relationship between Housing, Employment and Commuting (CD28).

The provision of retail

Strategic Approach

- 5.39 The provision of retail is driven by the settlement hierarchy of the Core Strategy which reflects the key principles established through the RSS process. These roles are reflected in the approach taken by neighbouring authorities and established in their own Core Strategies.

Strategic Issues

- 5.40 The retail/catchment role of York stretches beyond its local authority boundaries. This arises from the considerable draw of the city centre. It is recognised however that not all York's retail centres are in the most sustainable locations due to historic Development Management decisions, such as the out of centre retail parks at York Designer Outlet, Monks Cross and Clifton Moor.
- 5.41 It is considered important to retain the strength of the City's offer as this supports the wider sub-regional economy. However, it is expected that the key focuses for development in adjoining authorities will remain as their own principal towns as it is important they retain their capacity to meet local services needs for local residents.

The Core Strategy Approach

- 5.42 New retail development will be prioritised in the City Centre to support its vitality and viability. By 2031 the Core Strategy vision indicates that York City Centre will have strengthened its role as a sub regional shopping and entertainment centre through increasing the supply of modern retail units and enhancing department store representation. This includes the expansion of the city centre through the development of the Castle Piccadilly site, complemented by new retail provision on the Former York Central Strategic Allocation.

Consultation Responses from Neighbouring Authorities and Prescribed Bodies

- 5.43 English Heritage supported Policy CS17 'The Distribution of Retail Growth'. No further strategic comments were received on retail from other bodies or authorities.

Approaches of Neighbouring Authorities

- 5.44 The adopted Hambleton and Harrogate Core Strategies and emerging East Riding Core Strategy do not include approaches to retail provision that conflicts with York's approach as their centres closest to the boundary of York are identified for day to day retail provision only. For Selby, its emerging Core Strategy seeks to strengthen and regenerate the Principal Town of Selby and the local service centres of Tadcaster and Sherburn in Elmet to retain some of the leakage of retail spend to York, Leeds and Doncaster. The emerging Ryedale Core Strategy highlights that there is 'leakage' of Ryedale residents, particularly for non-food items, to York and that the Principal Town of Malton/Norton will be a focus for local retail and seek to retain some of this leakage within the District through provision of an additional food supermarket.

Commentary

- 5.45 While many of the neighbouring authorities point to some leakage of retail spend from their areas to the City of York this is to be expected from settlements within the

hinterland of a major City. Their approaches to providing more convenience and appropriate levels of comparison retail to strengthen their towns will not conflict with the City of York Core Strategy and there has been no evidence to suggest that the City of York Core Strategy approach will impede the ambitions of neighbouring authorities given that it's retail strategy is focussed on a city centre first policy approach.

The provision of infrastructure for transport, waste management and energy

Strategic Approach

- 5.46 The RSS set out to optimise the existing critical infrastructure in the area through a settlement network which distributed levels of development according to role of place reflecting sustainable transport objectives.
- 5.47 Waste Management was also a key theme in the RSS, indicating that waste planning authorities should ensure that adequate sites and facilities are available to deal with the highlighted waste tonnages set out in the RSS and this could be done jointly or individually.
- 5.48 Indicative local targets for installed grid connected renewable energy were set out with the RSS and specific targets are given for York. The targets in the RSS came from the Sub-regional Renewable Energy Assessment and Targets Study (REAT) (2004). The REAT study focused on large scale renewable energy generation. The outcomes of a study undertaken by Land Use Consultants for York and North Yorkshire in 2005 fed into creating the targets in the RSS in relation to micro-generation. However it should be noted that these targets have now largely been superseded by more locally specific studies into renewable energy capacity factoring in deliverability.

Strategic Issues

- 5.49 The main issues arising around infrastructure relate to the challenges of providing sufficient infrastructure to enable the delivery of sustainable new development in an economic climate where external funding is reduced. This is shared amongst the neighbouring authorities of the City of York. The City of York Council's Infrastructure Delivery Plan (**CD9**) and work done with neighbouring authorities points to the cross boundary transport related infrastructure issues which are well known and relate to congestion on the York outer ring road, the A64 and to a lesser extent the A19. The A1079, is used by the majority of York's daily commuters into the City from the east and has poor public transport provision.
- 5.50 For waste management, continued joint working with North Yorkshire County Council on the Waste PFI project reflected in the Core Strategy is considered to be essential in order to progress the municipal waste facility through the application stage to the construction and operation of the plant. This is key to dealing with future levels of municipal waste.

The Core Strategy Approach

- 5.51 As set out in Section 4, the Council's Infrastructure Delivery Plan (**CD9**) involved consultation with many different infrastructure providers (as listed in Annex 1 of that document) and each of the neighbouring authorities. The Council will work with infrastructure providers to ensure that new development will be supported by appropriate and timely infrastructure provision. If critical elements of infrastructure cannot be delivered this would trigger a review of development levels.
- 5.52 The LDF will play a key role in addressing the City's transport issues but also the issues of congestion accessibility, safety and air quality. Within the context of meeting the city's development needs the LDF will complement York's Local Transport Plan 3 and will help deliver a fundamental shift in travel patterns away from the car to more sustainable modes. Firstly, by reducing the need to travel and secondly by ensuring that sustainable transport provision is a key component of future development. It will also be ensured that future transport infrastructure is appropriate to the level of development proposed in this plan. The Topic Paper on the Transport Implications of the LDF (**CD7**) considers the implications of levels of growth on the network over the plan period.
- 5.53 The Council has worked alongside North Yorkshire County Council in the preparation of its emerging Waste Core Strategy and the City Council is a member of the York and North Yorkshire Waste Partnership⁵. The Council has also worked jointly with the County Council with regard to proposals for a waste management facility at Allerton Park⁶.

Consultation Responses from Neighbouring Authorities and Prescribed Bodies

- 5.54 Natural England and the Environment Agency support the use of planning obligations to secure infrastructure provision. The Highways Agency would like to work with the Council to establish what transport infrastructure is required to deliver LDF aspirations and understand how these will be funded. It was also suggested that the strategic road network be added to the list of site specific and strategic infrastructure provision where contributions may be required. No strategic comments were received from neighbouring authorities or prescribed bodies regarding waste or energy provision.

Approaches of Neighbouring Authorities

- 5.55 Most of the main cross boundary issues relate to the strategic road network which crosses the City of York boundary. The emerging Ryedale Plan notes that focussing development at Malton and Norton is likely to increase the volume of traffic using the A64, especially in the York direction. This will be mitigated by encouraging the use of bus and rail travel, ensuring that new development is accessible to the bus rail interchange and that improvements to this facility are delivered. In addition, the

⁵ Let's Talk Less Rubbish: A Municipal Waste Management Strategy for the City of York and North Yorkshire 2006-2026 York and North Yorkshire Waste Partnership, supported by Enviros Consulting Ltd

⁶ Allerton Park Waste PFI Planning Application (2011) – joint planning application for York and North Yorkshire.

District Council will work with the Highways Agency, the City of York and other neighbouring authorities to identify a package of improvements to the A64 to be funded through developer contributions and in time, the Community Infrastructure Levy. In the longer term it is anticipated that the strategy of diversifying the economy of the Principal Town will mean that a broader range of employment opportunities will be available locally, reducing the need for some residents to travel to York.

- 5.56 The adopted Harrogate Core Strategy includes significant improvement to rail services between Harrogate, Knaresborough and York in its vision. This is seen as important to open up the towns economic role especially tourism and conferencing. For Hambleton, its adopted Core Strategy identifies its infrastructure improvements on the Principal Towns of Northallerton and Thirsk in recognition of their role in the District. The emerging Selby Core Strategy seeks to focus its infrastructure improvements on the town of Selby, Sherburn in Elmet and Tadcaster.
- 5.57 The North Yorkshire County Council Local Transport Plan 3 has not set out scheme prioritisation yet and is establishing the broad principles of how this may operate within the area. The emerging East Riding Core Strategy focuses infrastructure improvements on the A1079 in recognition of the poor quality public transport provision currently. The plan lists the City of York as a delivery partner.

Commentary

- 5.58 Most of the infrastructure initiatives that are raised through the City of York and neighbouring core strategies relate to the delivery of development within the main settlements. For the East Riding many people commute into York along the A1079 and the authorities are committed to improving public transport access along this link. East Riding is investigating, through its recently commissioned infrastructure study, improvements at key junctions on the A1079. It should also be noted that the Highways Agency has recently completed traffic modelling of the A64/A1079 junction to identify improvements required in the short, medium and long-term. The City of York's Local Transport Plan 3 aligns with the wider North Yorkshire and East Riding Plans (including the North Yorkshire and York Transport Strategy). This is helped by the activities of the North Yorkshire and York Transport Board and officers group, for which the City of York Council provide a secretariat function. See Annex 1.
- 5.59 A York Sub Area Joint Infrastructure Working Forum has recently been established as a forum for authorities that comprise the sub area. It will play an important role in engaging authorities in a dialogue regarding strategic infrastructure issues. This includes the consideration of cross boundary potential offered by the Community Infrastructure Levy.
- 5.60 With regard to waste management sub regional working has taken place between the York and North Yorkshire authorities on providing a municipal waste facility.

Strategic environmental considerations

Strategic Approach

- 5.61 All authorities in the Leeds City Region and North Yorkshire and York Sub Region are committed to adapting to the effects of and mitigating the causes of climate change. The distribution of development in the RSS sought to reduce the need to travel and ensure that new development was accessible. The Leeds City Region LEP Plan includes as a strategic priority the facilitation of a low carbon economy.
- 5.62 The approach to green infrastructure has been driven by work undertaken by Natural England at a regional level and has been developed in tandem, and as part of, the wider Leeds City Region Green Infrastructure Strategy which highlights key cross boundary assets and projects.
- 5.63 Under the RSS the strategic approach to Flood Risk relates to its pro-active management by avoiding development in high risk areas through the application of the sequential approach. This reflects the importance of using Strategic Flood Risk Assessments to help inform the location of development. It is essential, within this approach, that flood risk is managed for the whole of a River from it's source to it's mouth due to their cross boundary catchments.

Strategic Issues

- 5.64 In addition to the wider challenge of addressing climate change, the key strategic issue relates to ensuring that a common approach to the retention and enhancement of Green Infrastructure Corridors is adapted across the region. This includes delivering the aspirations of partner strategy documents and actions plans, including the Regional Biodiversity Strategy and River Basin Management Plans. It is also important to recognise the role that York's historic character plays in enhancing the region's social and cultural identity, acknowledging that historic assets offer wider benefits in terms of investment, employment and tourism across the wider region.
- 5.65 In relation to the provision of infrastructure for flood risk management it is important to continue joint working with the Environment Agency on flood risk modelling. In light of new flooding events and climate change it will be essential to ensure that future development continues to be located in areas of low flood risk.

The Core Strategy Approach

- 5.66 Addressing climate change is a key influence of the Core Strategy vision. York's LDF will promote the creation of sustainable neighbourhoods to help people live lower carbon lifestyles and will aim to support the growth of the local economy in a sustainable way which delivers increased prosperity for the whole community whilst reflecting the challenge of addressing climate change. The promotion of a low carbon economy will be central to this approach. The LDF will play a key role in helping contributing to a reduction of York's carbon and eco-footprint and helping the City to adapt to and mitigate against climate change. This will involve striking an appropriate balance between physical growth and environmental sustainability and ensuring that the environmental consequences of our actions are adequately understood and managed.
- 5.67 The Core Strategy embeds within its spatial strategy the protection of Green Corridors, nature conservation sites, open space and areas which contribute to the

historic character and setting of the City. Further, it sets in place the Council's intent to develop a Green Infrastructure Strategy, recognising the value of York's landscape, biodiversity and geodiversity in supporting healthy communities, cultural value, a buoyant economy and aiding resilience to climate change.

- 5.68 The LDF will ensure that the City's heritage assets are preserved and enhanced. The LDF will help York to safeguard its outstanding heritage for future generations by promoting development that respects the City's special character and encourages opportunities for rediscovering and reinterpreting those assets.
- 5.69 A key element of the Core Strategy vision is to ensure that new development is not subject to, nor contributes to, inappropriate levels of flood risk from the River Ouse, Foss and Derwent and other sources. This is an important component of the overall Spatial Strategy of the Plan. This approach is underpinned by the Council's SFRA on which the Council has worked closely with the Environment Agency. The rivers Ouse, Foss and Derwent all cross more than one local authority boundary, but the Core Strategy approach seeks to ensure that development in the City of York area does not cause problems with the Local Authority area or elsewhere.

Consultation Responses from Neighbouring Authorities and Prescribed Bodies

- 5.70 No comments were received on climate change from neighbouring authorities or prescribed bodies, or with regard to flood risk, waste, minerals or energy provision.
- 5.71 The Environment Agency indicated that they were satisfied that aspirations of the vision would avoid inappropriate development in areas of flood risk. They also supported the approach that "greenfield areas subject to high flood risk (Flood Risk Zones 3a and 3b) are considered as inappropriate for future development for housing or employment". The Agency indicated however that they expected to see a freestanding Sequential Test Topic Paper and further references to the sequential test in relevant policies relating to development and the Sustainability Appraisal. They also indicated that they felt further clarity was required in the specific flood risk policy.
- 5.72 At the preferred options stage English Heritage questioned the approach to York's distinct heritage assets and the potential impact of development on the historic character and setting of the city. However at the Submission Draft stage their concerns had been addressed and they support the approach taken.

Approaches of Neighbouring Authorities

- 5.73 The approaches of neighbouring authorities to addressing climate change is consistent with that of the Council. The main area where environmental issues arise relates to green infrastructure. The wider strategic work on Green Infrastructure⁷ identifies a common vision for Green Infrastructure in the Leeds City Region to determine how future investment in Green Infrastructure will be secured and targeted. It comprises the cities and districts of Bradford, Calderdale, Kirklees,

⁷ Natural England Green Infrastructure Study (2009), Leeds City Region Green Infrastructure Study (2010)

Leeds, Wakefield, Barnsley, Craven, Harrogate, Selby, York and parts of North Yorkshire. This strategic work also identified region wide Green Corridors, focuses the work of authorities and statutory and voluntary agencies, providing the evidence necessary to protect strategic and local green corridors and networks.

Commentary

- 5.74 Climate change mitigation and adaption have been a key influence in the preparation of Core Strategies across the region and are embedded within the City of York's Core Strategy and neighbouring authorities' plans. Green Infrastructure being the main cross boundary environmental issue in the conservation and enhancement of the natural environment. The City of York has worked closely with neighbouring partners to develop a common approach to Green Infrastructure, including playing a key role in the production of the Leeds City Region Green Infrastructure Strategy (2010). York's policy approach will help to deliver the shared aspirations of these partners.
- 5.75 For flood risk management the City of York Council has worked closely with the Environment Agency in developing its SFRA. This underpins the approach in the plan. The policy response included within the Core Strategy is considered by the Council to be an appropriate response. The strategic approach within the Core Strategy aims to ensure that development in the City of York area will not cause flood management problems for neighbouring authorities.

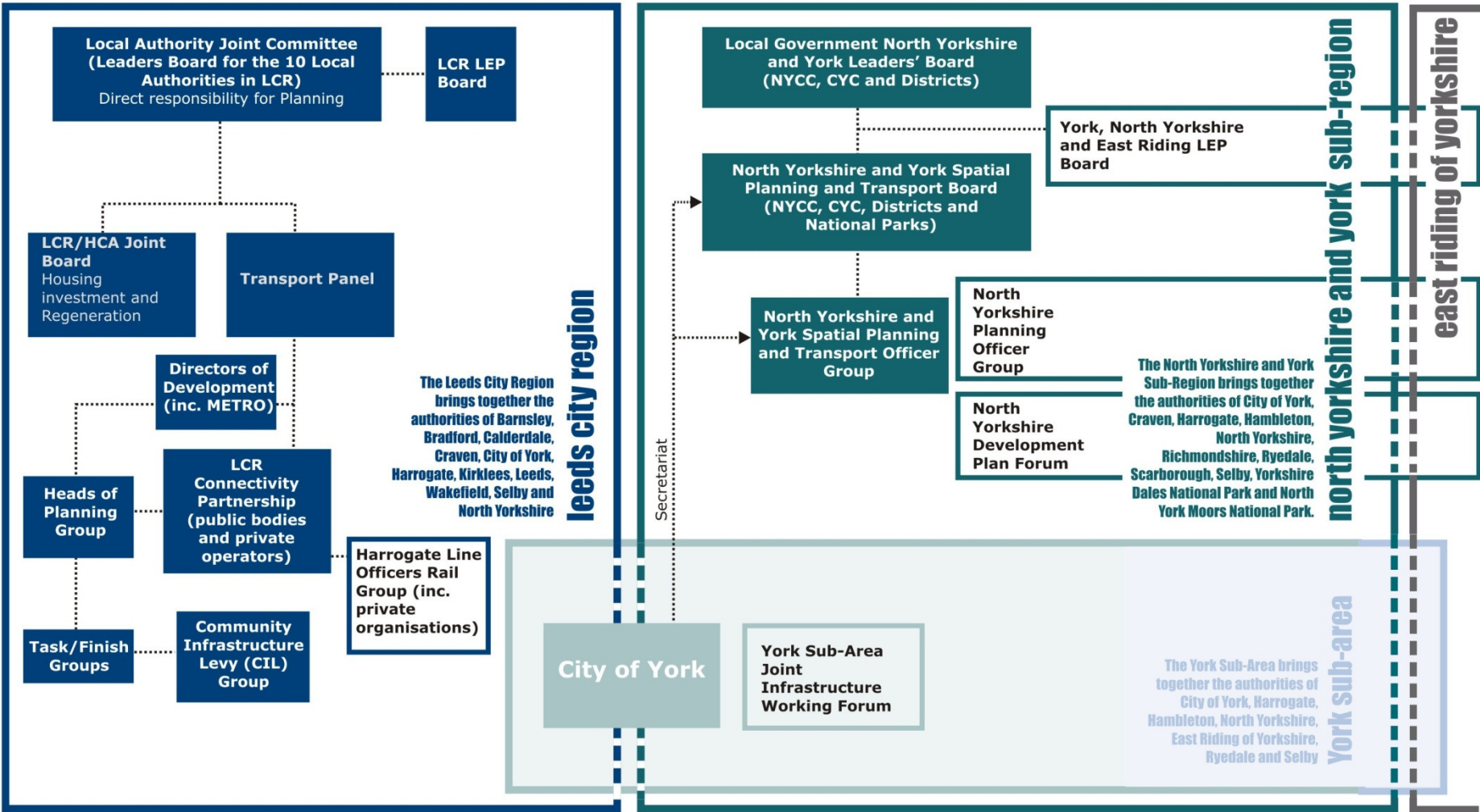
6.0 Contemporary Strategic Approach to Co-operation

- 6.1 Supporting Paper 6 (**CD9**) and Annex 2 set out the context of cross boundary strategic planning relevant to the preparation of the City of York Council Core Strategy. Post RSS this has manifest itself in the Leeds City Region Interim Strategy Statement (2011) and the North Yorkshire and York Sub Regional Strategy (2011) examined the mechanisms for continued strategic work.
- 6.2 Annex 1 shows the current governance arrangements for the North Yorkshire and York sub area (extended to include East Riding of Yorkshire in the LEP) and the Leeds City Region as they affect and can be influenced by York. The York subarea is a functional sub area in its own right and it cuts across these two larger sub areas. It can be seen from Annex 1 that following the abolition of regional governance, the emerging new structures are complex but City of York Council are engaged in all of the Boards/Groups either formally with Member representation or at office level.
- 6.3 The City of York Council continues to play a proactive role in the newly created governance structures following the abolition of the regional tier. This will ensure co-operation with other authorities in the preparation of coordinated strategies.

Annex 1: Current Joint Working Arrangements

LEEDS CITY REGION

NORTH YORKSHIRE AND YORK WITH THE EAST RIDING



Annex 2: Former Strategic Approach to Co-operation

The RSS was adopted in 2008 and at that time became a part of the development plan for each local authority in the Yorkshire and Humber Region. The City of York Council had extensive involvement in preparing evidence for, shaping and engaging with the Regional Strategy between 2003 and 2010, demonstrating that it was engaged in a process of co-operation with neighbouring authorities and prescribed bodies.

The NPPF notes in Paragraph 218 that “where it would be appropriate and assist the process of preparing or amending Local Plans, regional strategy policies can be reflected in Local Plans”. As such, there is an understanding in Government that while the RSSs are in the process of being abolished, their approaches and evidence are still relevant for the purposes of local plan making. The Council considers that this is the case in the City of York. The principles of the RSS which were tested at examination by the Planning Inspectorate and found to be sound, remain so important in the context of local strategic issues for York during the preparation of the Core Strategy.

Developing and managing relationships around the regional strategy

Extensive co-operation was undertaken between the City of York Council and the local authorities which comprise the North Yorkshire and York Sub Region. This followed on from the experiences of preparing the Joint Structure Plan up until 2004.

The City of York Council was a member of the North Yorkshire Forum Officer Group which was established in 1998 to oversee comments to Regional Planning Guidance but from 2003, when the Regional Assembly began the process of producing a regional strategy, became focussed on influencing the RSS. The group met fourteen times between 1998 and 2008 when the RSS was adopted. North Yorkshire County Council acted as secretariat for the group and its purpose was to lobby the Regional Assembly with a common line between North Yorkshire and York authorities. In this way the individual local authorities of the North Yorkshire and York Sub Region ensured that it used the 11 votes available on the Regional Planning and Infrastructure Committee (where each local authority member had a vote) for the good of the sub-region as a whole.

The main common strategic issues where the local planning authorities worked together to help shape the RSS related to:

- an approach to restraint in the Sub-Region and a removal of the pressure for new housing that had begun to originate from the large conurbations (this approach has been taken historically and predates work on the RSS);
- meeting Sub-Regional needs within the Sub-Region and local needs locally through the settlement network;
- recognising and setting strategic direction for the high quality environmental, heritage and biodiversity assets of the Sub-Region;

- clarifying the role that local service centres may play in delivering affordable housing for local needs but also market housing where necessary; and
- defining sub areas for the Sub-Region including York

The City of York's Influence on the Regional Spatial Strategy

The specific strategic issues relating to York which had immediate cross boundary impacts can be sourced from a report to the City of York Council Executive in March 2005. The key issues were:

- protecting the special setting of York and in particular its Green Belt,
- the economic role of York as one of the five Key Cities in the region,
- the acute affordable housing needs of the city, and
- the specific transport priorities.

It should be noted that initial versions of the RSS did not include a York Sub Area. Therefore, the paper noted that the RSS would need to take into account the spatial planning issues for the York hinterland that flow from very particular circumstances, including York's continued economic success; increased pressure on wider housing markets; acute affordable housing problems; heritage, environment and Green Belt constraints within the City; and the need for surrounding communities to meet their local needs and benefit from the economic success of York to aid their renaissance and achieve sustainable communities. To this end, the Council strongly lobbied for the City of York authority to be included within its own Sub Area alongside recognition of the role that the City plays in the Leeds City Region. Ultimately the Council's Executive confirmed that they sought a balanced and clear approach to development where the economic, social and environmental needs of York and its hinterland are recognised and sustainable development solutions to these within the City and surrounding settlements are encouraged.

The Council, along with the County Council and neighbouring authorities were successful in lobbying for a York Sub Area within the RSS. This functional area is centred on the City of York and includes all of the City of York Council area, Selby District, the southern parts of Hambleton and Ryedale District Councils, the south-eastern part of Harrogate District Council and the north-western parts of the East Riding of Yorkshire Council.

There were several other strategic matters around which the City of York Council made statements to the Examination in Public in 2006 comprising:

- agreeing that the Sub Area approach provided an appropriate strategic direction and outcomes for the City of York;
- welcoming the inclusion of the City of York within both York Sub Area and Leeds City Region Sub Area. Welcoming York's role within the 'polycentric' Leeds City Region of eight towns and cities and the specific recognition that each town and city will play a different role;
- recognising that the separate but overlapping 'York Sub Area' allows for York's distinctive role in the Leeds City Region to be clearly articulated taking into account its specific opportunities and constraints;

- recognising the functional role of York as a Sub-Regional employment centre for North Yorkshire with an increasingly important role in the Leeds City Region, meaning that it provides employment opportunities across a much wider area than its own administrative boundaries;
- seeking more clarity on the wider roles of places within sub areas in relation to the role they play within the hinterland or sphere of influence of higher order centres. This sought to clarify the 'polycentric' nature of places within the regional Sub Areas. This was linked to "spreading the benefits" of the York economy whereby for example some of the spin off growth associated with Science City York would be likely to result in new employment in surrounding towns, such as Malton and Selby;
- support for identifying regional priority sectors and clusters especially around science and technology;
- expressing concerns around reconciling growth with the environmental capacity of the York Sub Area and recognising that the link between economic growth and housing is a complex one that doesn't fit into administrative boundaries; and
- considering that the City of York should be classed as a Regional Centre alongside Leeds, Kingston upon Hull, Sheffield and Bradford. It points to its role as an international tourist destination, a major retail centre, a university city, the 'Science City' proposal and its influence over a wide hinterland.

Main issues arising at the Examination in Public

Understanding the debates that occurred at the Examination into the RSS reveals how the main strategic issues have been addressed and it is important to note that these debates have influenced the Core Strategy policies. It is important to note that there were no objections from neighbouring authorities or statutory bodies around the principles and outcomes of the wider York Sub Area approach in the RSS. Those debates that occurred at the Examination in Public around the roles of places in the wider York Sub Area were stimulated by landowners and housebuilders and related to the roles of Easingwold (Hambleton District Council) and Boroughbridge (Harrogate District Council), and Malton/Norton (Ryedale District Council) where arguments were put forward to promote the roles of these places and deliver more growth than was being suggested by the RSS process and emerging local plans.

The Panel noted that there may be difficulty in accommodating significant housing levels in the York because of the need to safeguard the historic character of the city and its environmental constraints. However, they also called for further local work to establish the environmental capacity of York and whether there is potential for York to deliver more growth.

It is also important to note that there was no disagreement amongst local authorities in the North Yorkshire and York Sub Region that restraint in rural areas was an appropriate strategy, subject to the local service centres within the York Sub area and wider North Yorkshire rural area, being allowed to take some market housing to support affordable housing and other local housing needs. There was agreement that the RSS set out a coherent settlement strategy for the Region. Policies YH5 'Principle Towns' and YH6 'Local Service Centres and Rural and Coastal Towns' articulated clear roles for Regional/Sub Regional Centres and Principal Service

Centres and Local Authorities established a range of local services centres where more limited development was appropriate.

Abolition of RSS

In the period following the Governments intention to abolish the RSS there was considerable uncertainty surrounding the strategic policy framework for spatial planning in the Leeds City Region which addresses those matters that are 'bigger than local' and require collaboration between the Planning Authorities in the City Region. There was considered a need by the Leeds City Region Partnership for an interim strategy position to help manage the uncertainty on strategic policy and to make clear the continuing support for the policy principles in the RSS that support shared objectives across the City Region. The Leeds City Region Interim Strategy Statement received approval from the Leeds City Region Leaders Board in 2011.

This Interim Strategy Statement (2011) sets out a recognition by all authorities in the City Region that the policies in the former RSS which articulate the urban transformation ambition should provide the start point for an interim strategy statement. Along with policies that safeguard the environmental assets of the City Region and the key spatial investment priorities that are set out in the already agreed City Region strategies. The authorities in the partnership also continue to support the broad policy thrust of the former RSS and the principles of urban transformation contained in the Plan. To ensure these principles are retained, the Interim Strategy Statement includes policies from the approved RSS that address spatial principles.

In 2010 Local Government North Yorkshire and York (LGNYY) (a body of Local Authority Leaders which aims to promote the interests of local government in the sub-region and provide a means for facilitating co-operation between constituent councils) was conscious of the structural changes occurring to regional bodies and the need for a strongly articulated Sub-Regional view. It requested that a Sub-Regional Strategy be produced to advocate the aspirations of the Sub-Region and that this strategy should bring together local evidence in relation to housing, transport, the economy and the environment.

The Spatial Planning Board (SPB) and York and North Yorkshire Partnership Unit were tasked with driving much of this work. A Sub-Regional Strategy was agreed by Local Government North Yorkshire and York in June 2011. The SPB was supported by several thematic boards on housing, spatial planning, transport and economy. In June 2011, LGNYY recommended the Spatial Planning and Transport Boards be merged and the Economy/Skills Board disestablished. This latter structure for LGNYY governance, which includes the officer working groups that support the thematic boards, is shown in Annex 3. This also shows the governance structure for the Leeds City Region, the connections with East Riding of Yorkshire (through the York, North Yorkshire and East Riding LEP) and the 'fit' of the York Sub Area within these governance structures.

One of the key principles that the SPB succeeded in enshrining in the North Yorkshire and York Sub Regional Strategy is that the approach to delivery of critical priorities needs to be strongly rooted in the diverse places and spaces of North Yorkshire and York and to understand and capitalise on the different opportunities

that are available in different parts of the Sub-Region. It also set out that places have different roles and characters that determine how they relate with each other.

The York Sub Area is an important and successful part of the economy of the north of England. While the sub area has a role that is linked to the Leeds City Region and wider North Yorkshire it also has its own distinctive characteristics. The City of York is an important driver of economic growth and has claims to be classified as a “Regional City” along with Leeds, Bradford, Sheffield and Hull.

Annex 3: RSS York Sub area Policy

POLICY Y1: York sub area policy

Plans, strategies, investment decisions and programmes for the York sub area should:

A Roles and functions of places

1. Ensure the roles and function of places in the York sub area complement and support those described in the Leeds City Region
2. Develop the role of York as a Sub Regional City and support the roles of Selby and Malton as Principal Towns

B Economy

1. Diversify and grow York as a key driver of the Leeds City Region economy by encouraging the business and financial services sector, knowledge and science-based industries, leisure and retail services and the evening economy, and further developing its tourism sector
2. Spread the benefits of York's economic success to other parts of the sub area and ensure that all members of the community have access to employment opportunities
3. Deliver economic growth at Selby and Malton in line with their roles as Principal Towns
4. Identify and safeguard a site for the Spallation project, in the vicinity of Selby

C Environment

1. In the City of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York city centre and the inner boundary in line with policy YH9C.
2. Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minster and important open areas
3. Protect and enhance the particular biodiversity, landscape character and environmental quality of the York sub area – including the 'Vales' area, Humberhead Levels area, the Derwent Valley area, the Wolds, Howardian Hills AONB, and protect the integrity of internationally important biodiversity sites
4. Help to mitigate flooding through proactive planning and management and provide appropriate protection, especially in York and Selby
5. Avoid depleting the Sherwood Sandstone aquifer
6. Improve air quality, particularly along main road corridors in York (based on AQMAs)

POLICY Y1: York sub area policy *continued*

D Transport

1. Develop the role of York as a key node for public transport services for the sub area
2. Implement stronger demand management in York and in relation to the strategic highway network
3. Improve accessibility to and within York, particularly by improved facilities for walking and cycling, increased capacity and quality of public transport, and new park and ride facilities
4. Improve public transport links between Local Service Centres and other rural communities and York and the sub area's Principal Towns
5. Improve access between York and Scarborough/ the east coast

E Strategic patterns of development

1. Focus most development on the Sub Regional City of York, whilst safeguarding its historic character and environmental capacity
2. Promote development at Selby to foster regeneration and strengthen and diversify its economy within the Leeds City Region
3. Support an appropriate scale of development at Malton to support local regeneration and the role of York
4. Elsewhere in the sub area, use a managed approach to development to focus on meeting local housing needs and appropriate economic diversification

F Regionally significant investment priorities

1. Develop the sub area economy with major new development and initiatives including Science City York, York Northwest, further developing and expanding York University and supporting the SPALLATION Project at Selby
2. Manage flood risk in line policy ENV1 along the Ouse at York and Selby, in the Derwent Valley, and in the Humberhead Levels area

G Joined up working

Promote partnership approaches to economic diversification, regeneration, housing distribution, development and flood risk management throughout the York sub area