

17th April 2012

SELBY CORE STRATEGY EXAMINATION

Reference: 73

These additional representations respond to papers produced by Selby District Council and City of York Council (CYC) relating to the Duty to Co-operate established by the Localism Act and the need for the respective Core Strategies to reflect strategic cross-boundary issues as required by NPPF: also in reply to CYC's response to Selby's (post September 2011) proposed changes to the Core Strategy.

A principal strand of Selby's CS is to achieve/pursue self-containment in meeting the District's development needs. CYC's position is that York CS also provides adequately for the city's development needs. Both Authorities indicate that, whilst they have consulted meaningfully with each other in preparing their Core Strategies, there are no cross-boundary issues that need to be taken into account in either Plan.

I do not accept that this is correct. At this Examination others deal with Selby's housing requirements and I defer to their detailed evidence. I have referred in previous submissions to the numerous objections to York's Core Strategy on grounds which include the under provision of land for development – particularly housing. This has been picked up by York's Examination Inspector and the matter is to be discussed at an Exploratory meeting next Monday. I have also noted that the outer boundary of York's –about 6 mile– wide green belt is very largely contiguous with the boundary of York administrative area – thus, as things stand at present, any unmet requirements in York can only be provided by leapfrogging the green belt.

York's Core Strategy sets out a requirement for around 16,000 new dwellings within the Plan period. Of these, about 20% are anticipated to be provided on (unidentified) windfall sites. A further (approximately) 20% are anticipated to be provided on two urban brownfield sites totalling about 75 hectares of developable land, with a host of delivery issues, as follows:

York Central: site first identified in 2003. Around 20 owners including Railtrack who initially supported redevelopment but subsequently indicated they required £20m up front before they

would consider selling. This site has been marketed twice Europe-wide, with a prospect of euro funding and RDA backing in better economic times, without success.

Sugar beet factory: site first identified in 2006.

In 2007, CYC resolved to prepare a Joint Area Action Plan for the two sites.

In 2010 CYC accepted the sites would develop over different timescales so resolved to consider them separately although also acknowledging the sites shared common infrastructure requirements.

In December 2011 CYC (Local Development Framework Working Group) noted the cost of access infrastructure works as between £30.8m and £60.6m depending on the access option chosen.

In March 2012 the LDF Working Group received a further report on the access issues affecting the sites. The report identified numerous transport and access problems which will cause disturbance to residential amenity but noted that *the sites are needed to come forward to protect the green belt and grow York's economy.*

Three options were noted, one of which was not to proceed with the development of the sites at all in consequence of the difficult transport issues. Under the heading *Risk Management*, the report notes that transport issues could lead to the stalling or termination of the development or that transport impacts may be inadequately mitigated to the detriment of York's environmental quality and economic prosperity.

Further work was authorised on transport infrastructure but no timescale was set for this. The problems associated with these two sites are identified in the York Examination Inspector's notes (appended to my previous submissions).

Other significant residential sites identified in York's CS

Terrys: redevelopment of a chocolate factory site to provide 395 dwellings (and commercial and retail development). The site was bought speculatively by a developer about 5 years ago and now has planning permission but has just been put back on the market by the owner as its development is considered to be unviable.

Germany Beck: 700 dwellings. Granted permission by the Secretary of State in 2007.
Development has not yet started.

All of the available evidence demonstrates York's determination not to trespass on what the Council believes to be green belt surrounding the City but, equally, it is plain that York has underestimated the City's development (principally housing) requirements and overestimated the ability of identified sites to deliver the required level of housing.

York's Core Strategy has no Plan B. There are clear implications for Selby that require to be positively addressed through cross-boundary co-operation.