

Rt Hon Ruth Kelly MP
Secretary of State
Department of Communities and Local Government
Eland House
Bressenden Place
LONDON
SW1E 5DU

Dear Madam,

The Yorkshire and Humber Plan: Regional Spatial Strategy Review.

I appreciate that it is not common practice to write with regard to a Panel's report on an Examination in Public of an RSS. In these particular circumstances however I feel compelled to do so.

The first issue, and perhaps the more important one, is the very limited shelf life of the Plan. The Panel make numerous references to their difficulty in dealing with the information before them on housing and employment matters. They conclude at paragraph 5.36 that an early review of the Plan is necessary. To compound the issues identified by the Panel, the new 2004 based projections will of course have to be taken into account in the final version of the RSS as required by PPS3.

The difference between the Panel's recommendations and the implications of these new projections are substantial. There is now clear evidence that if you were to approve the RSS on the present recommendations there will be a 40% shortfall compared to the latest housing projections in the period to 2011, a 17% shortfall in the period 2011 to 2016, and a 10% shortfall in the period 2016 to 2021 (see table attached to this letter). This, I would ask you to note, is a shortfall against a trend based projection whereas the approach adopted by the Regional Authority and endorsed by the Panel was one of increased housing demand above past rates as a result of economic growth – the shortfalls can therefore be treated as minima.

It is clear that having regard to issues highlighted by the Panel the RSS does not provide sufficient guidance for the drafting of local development documents. Coupled with the fact that for the authorities in the Leeds City Region there is no advice on district level housing provision post 2011 on which they can base their LDF work I suggest that these issues are required to be dealt with as part of this review and cannot be postponed even for the time that an immediate review would take to implement.



It is noted that if the RSS does not deal fully with the implications of the 2004 projections then, according to PPS3, it is clear that these will have to be debated on a district by district basis as part of the LDF process. Given the scale of the difference in figures and the pattern of the distribution of demand this would appear to be a less than optimum solution.

The second issue is that there are important omissions from the Panel's Report which might, if not corrected, have a bearing on the soundness of the strategy. To some extent this is due to the fact that while some consultants provided the Panel with projections and analysis of the 2003 based household projections these were not subject to detailed debate. Instead the debate was limited and the Panel's Report focuses only upon the revised projections submitted towards the end of the Examination in Public.

This approach was unfortunate as much of the information regarding issues such as potential rates of delivery, urban capacity and environmental impact could have been provided by the contributors to the debate in a similar manner to that which we have experienced elsewhere, for example in the East of England, South East and South West EIPs. For example the past rates of provision within the region have been greatly affected by the impact of PPG3 with many authorities not permitting any greenfield provision and some even restricting development on PDL sites where their old strategic target has been met.

The Panel suggest that in terms of housing and employment alignment they did not have detail on this matter. This is simply incorrect and I enclose copies of DLP's submission on matter 4A and 4F which clearly set out these issues. It is clear that the implications of the proposed dwelling distribution in the Draft RSS has not been taken into account by the Panel as their suggested distribution clearly undermines the potential of economic growth in the areas of the North Yorkshire authorities for example.

While I appreciate the normal process is for your proposed amendments to be published for further consultation in this case and in order to address the significant gap between the obligations of PPS3 and the Panel's recommendation a limited reopening of the Examination in Public might be more appropriate and constituent less delay than an early review.

It is our concern that agreement to an early review will lead to a delay in the production of LDF's to meet the emerging demand for housing in the region. Any review will likely take in the order of a further 5 years to progress though the system and as such most authorities will not produce LDF's to meet the higher figures in the post 2011 period on the basis that these are subject to an almost immediate review. This would result in not just a 7 year period of under provision but actually a much longer one. Such a high level of under provision of housing in this region does not appear to be accordance with either PPS3 or the Northern Growth Area Strategy.



I look forward to your response.

Yours Sincerely,

A handwritten signature in dark ink, appearing to read 'M. Bolton'.

P.P. **Roland G Bolton BSc (Hons) MRTPI**
Director

Cc Government Office for Yorkshire and the Humber.

Encl Table illustrating underprovision
Submissions on matter 4A and 4F