

SHLAA Methodology Working Group Paper

1. The 2024 SHLAA

The SHLAA is an assessment of sites that may be available for housing development over the next fifteen years. It forms part of the evidence base for the New Local Plan, by providing an initial assessment of potential housing development sites. The SHLAA includes a number of methodological assumptions which are considered as part of Selby district's 5 Year Housing Land Supply reports. It examines the extent to which potential sites are suitable, available, and achievable over the plan period in a (local planning) "policy off" approach.

The purpose of this consultation document is to give the working group the opportunity to comment on the SHLAA methodology. The assessment will benefit from the experience and expertise of the working group, supporting a robust approach to projecting potential housing supply. This discussion will help provide informed judgements about forecasting supply, which will in the case of 5 Year Housing Land Supply calculations also be balanced against up to date site delivery forecasting / statements.

2. Types of sites in the assessment

- **Selby District Local Plan (2005) Allocations:** Sites allocated for housing in the 2005 Selby District Local Plan, which have since been saved by the Secretary of State and still make up part of the development plan.
- **Selby District Core Strategy Local Plan (2013) Allocation:** In the 2013 Core Strategy, a strategic site was allocated at Olympia Park in Selby for mixed uses including housing. A large part of the allocated site to the west has previously had permission for 863 dwellings (2012/0541/EIA).
- **Large Planning Permission:** These are sites with full, reserve or outline permission for housing developments of 10 units (gross) or more, this can also include applications which have been resolved to grant at planning committees, subject to successful section 106 negotiations, as of the 31st of March 2024.
- **Small Planning Permission:** These are sites with full, reserve or outline permission for housing developments of less than 10 units (gross), this can also include applications which have been resolved to grant at planning committees, subject to successful section 106 negotiations, as of the 31st of March 2024. These sites are only given a basic assessment.

- **Prior Approvals:** The scope of prior approvals can include developments of multiple dwellings. They are not technically planning permissions and so have been included as their own type of site. As these sites are less than 5 dwellings, they are only given a basic assessment.
- **Potential Site:** The potential supply is made up primarily of sites put forward by landowners and developers for consideration through the new Local Plan. They usually take the form of unallocated greenfield land outside of development limits, but include a variety of forms, including land currently allocated for education, employment and other non-housing uses.
- **Approve subject to section 106:** Applications which have been resolved to grant at planning committees, subject to successful section 106 negotiations, prior to 31st March 2024.

Dwellings which are restricted by an agricultural occupancy condition, dwellings which are classified as holiday accommodation and dwellings which comprise ‘Granny’ annexes are not included in the overall supply, as these are dwellings which are not considered to be available to the general public.

Sites can be several of the above types over time, for example a new site could be put forward for consideration in the Local Plan, and would be classified as a Potential Site, then it could be allocated in a Local Plan and then it could be granted permission. However, a site in the SHLAA can only be one type of site at any one time, so there is no double counting.

Question:

1. Does the working group agree with these types of sites as a viable source to populate the 2024 SHLAA?

3. Gross and Net

In the case of planning permissions, there may be dwellings lost on the site through demolitions, mergers of dwellings and changes of use. These are taken account of in the supply and completion of dwellings, which will both be net figures. This is further explained in table 7 below.

4. Net Developable Areas

The net developable area will be used to estimate the area of each allocated or potential site that can be built for housing use only. It is acknowledged by the Council that in order to give an accurate estimate of the housing potential of these sites, this aspect must be taken into account.

We have defined the net developable area as including those access roads within the site, private garden space, car parking areas, incidental open space

and landscaping and children's play areas (where these are to be provided). Beyond this, it is considered reasonable to exclude the following from the definition of net developable area:

- major distributor roads, significant landscape buffer strips, open space serving the wider surrounding area, or an area necessary to make space for significant water storage in areas of high flood risk;
- an existing on-site feature or wider constraint that limits the area that can be developed, such as the need to maintain an important landscape or wildlife site or historic assets (where they would limit the extent of a site that could be developed); and
- areas comprising non housing development, such as employment, commercial uses, or community facilities (such as new school or health centre)

Table 1b shows the Council's proposed assumptions for the developable area of sites, based on an assessment of different sizes of recently approved and completed sites in Selby district (Appendix A¹ table 1 and summarised below in table 1a). Larger sites tend to have more of their area used for non-housing uses and infrastructure and this is generally why the rates are lower as the site size gets larger. We also intend to give site promoters the option to submit their own assumptions for the developable areas of their sites.

Table 1a - Average Developable areas 2018 - 2024	
Site Size Bracket (ha)	Net developable area ratios (%)
Up to 1	99
1 to 5	87
5 to 10	84
More than 10	78

Table 1b – Proposed Developable areas	
Site Size Bracket (ha)	Net developable area ratios (%)
Up to 1	100
1 to 5	85
5 to 10	80
More than 10	75

Questions:

- 2. Is the definition of developable area appropriate?**
- 3. What are your thoughts on the proposed developable area ratios?**
- 4. Are the brackets of site sizes appropriate?**

¹ The reason for the different year ranges in the tables in Appendix A is to give a big enough sample size for certain categories in the tables such as site sizes, settlement hierarchies and brownfield/greenfield sites etc.

5. Density

The proposed densities in table 2b below are based on an analysis of permitted sites, as seen in Appendix A table 2 and summarised below in table 2a.

Densities have been worked out on the net developable areas of the site. We have found that the only consistent correlation on sites in terms of density is when they are grouped by type of settlement. Please note that sites with planning permissions already have their densities determined and will not be affected.

Table 2a - Average Density 2016 – 2024			
Row Labels	Greenfield	Brownfield	Average
Principal Town - Selby	30	63	50
Local Service Centre - Sherburn	27	34	29
Local Service Centre - Tadcaster	59 ²	43	53 ³
Designated Service Village	27	34	29
Secondary Village	20	20	20
Countryside	30	21	25
Grand Total	26	32	28

Table 2b – Proposed Densities	
Settlement Hierarchy	Densities (dph)
Principal Town (Selby) Brownfield (more than 50% PDL area)	50
Principal Town (Selby) Greenfield (50% or less PDL area)	40
Local Service Centres	35
Designated Service Villages	30
Secondary Village	20
Countryside	20

Questions:

5. Should sites be grouped by other factors?

6. What are your thoughts on the density rates proposed for sites without permission?

7. Are there particular locations which require higher density levels – for example urban brownfield sites?

² This is a high density as there have been limited housing completions on greenfield land in Tadcaster

³ This average density is high given the low number of completions in Tadcaster on both greenfield and brownfield sites.

6. Pre-build lead-in times

This is the amount of time it takes from obtaining planning permission to finishing the first dwelling. The approach taken factors in the size of the site in terms of dwellings, as well as the planning status of the site. The presumptions being that:

- the more advanced along the permission timeline, the shorter the time it takes to start on site, and;
- The bigger the site in terms of units, the longer it takes to negotiate the section 106 agreements.

The proposed lead in times in table 3b, below, are partly based on an analysis of the time it has taken recently approved sites to complete their first unit (seen in table 3a and Appendix A table 3). The proposed lead in times are not set and site promoters have the option to submit their own estimates for lead in times for their sites.

Table 3a - Average of Months between decision and first plot completed 2015 - 2024			
Application Type	1 to 10 Dwellings	11+ Dwellings	Average
REM/FUL	14	20	17
OUT	18	23	21
Grand Total	14	20	17

Table 3b – Proposed Lead in times (Months)		
Type of site	1 to 10 Dwellings	11+ Dwellings
Reserved matters/full planning	12	18
Outline planning permission	18	24
Sites without planning permission	24	30

Question:

8. What are your thoughts on the parameters for the lead in times and on the presumptions we have made?

7. Build rates

An analysis of the rate of completion from a range of developed sites (Appendix A table 4 and summarised in table 4a below) has led the Council to propose the build rates in table 4b below. Sites are grouped by size, this is because:

- Larger sites have been shown to be built out at greater rates by major national housebuilders, who have the capacity to do so.
- Smaller sites are generally built out by local builders, who build at a slower rate due to them having a lower capacity.

Table 4a - Average Build Rates 2014 - 2024	
Gross capacity of site (dwellings)	Annual Build rate
1-10	3
11-25	11
26-50	20
51-100	31
101-200	39
201+	49

Table 4b - Proposed Build Rates	
Gross capacity of site (dwellings)	Annual Build rate
1-10	5
11-25	10
26-50	20
51-100	30
101-200	40
201-500	50 (70 if 2 developers)
501+	70

Questions:

9. Are the sizes of sites appropriate?

10. Are the build rates appropriate?

11. Should location be factored into the assessment?

8. The assessment questions

Below are the proposed questions which will be included in the assessment of sites in the 2024 SHLAA. These questions have been formulated having regard to the most recent guidance in the planning practice guidance note for Housing and Economic Land Availability Assessments.

In line with the guidance, there will be a basic assessment of housing sites (shown in table 5) and then from this assessment a judgement in principle is made on whether the site is suitable for housing. If the answer is no the site will be put in abeyance. If the answer is yes, then the sites will be assessed in detail with the questions from table 6. Once sites are assessed for their Suitability, Availability and Achievability in table 7 they will be given a deliverability timescale and put into the supply of sites for housing. The methods for the application of these questions will of course depend on what is agreed with the working group.

Table 5 - Basic Assessment Questions	
Question Title	Explanation
SHLAA ID	The unique reference number for the site. This cross-references to the sites shown in the SHLAA maps.
Emerging Local Plan site reference	The unique reference for the site which cross-references to the references used in the Emerging Local Plan consultation documents for the Selby district.
Parish	The name of the parish the site is located in.
Settlement Hierarchy	Where the settlement is placed in the Core Strategy settlement hierarchy in policy SP4. This applies to sites that lie immediately next to the built form of the settlement, as well as sites that lie so close to the built form that it is reasonable to consider them as a possible extension to the urban boundary. The latter may include sites that are detached from the built form by a small field boundary or an area of open space (e.g. playing field). Sites beyond the built form are classed as being in the countryside
Location	Short description of where the site is located
Current land use	Description of the land use of the site.
Surrounding Land Uses	Description of surrounding land uses
Site Type	<ul style="list-style-type: none"> • Selby District Local Plan (2005) Allocation • Selby District Core Strategy Local Plan (2013) Allocation • Large Planning Permission • Small Planning Permission • Prior Approval Not Required • Potential Site • Approve Subject to S106
Allocations Reference/ Planning Permission Reference	<p>Reference should the site be a saved allocation in the Selby District Local Plan (2005) or an allocated site in the Selby District Core Strategy Local Plan (2013).</p> <p>Should the site have planning permission, this is the most recent planning application reference.</p>
Area (ha)	Gross area of the site measured in hectares (ha)

Greenfield/ Previously Developed Land	An indication as to whether the site is greenfield land, previously developed, or a mixture of both
% Greenfield	% of sites area that is greenfield, this will later be used to calculate the number of homes that could be built on greenfield land.
% Previously Developed Land	% of sites area that is previously developed land, this will later be used to calculate the number of homes that could be built on previously developed land.
National Policy Restrictions	<p><i>Minimum Site Size – 0.17ha (less than 5 dwellings at 30 dwellings per hectare)</i></p> <p><i>Sites of Special Scientific Interest (SSSI)</i></p> <p><i>Ramsar Sites, Special Protection Areas (SPA)</i></p> <p><i>Special Areas of Conservation (SAC)</i></p> <p><i>National Nature Reserves (NNR)</i></p> <p><i>Scheduled Monuments, Ancient Woodlands</i></p> <p><i>Health and Safety Executive Inner Zones</i></p> <p><i>Flood Risk areas - Zone 3b 'Functional Floodplain'</i></p> <p><i>Registered Battlefields and Registered Parks and Gardens</i></p>
Suitable for proposed use?	<p>An initial assessment on whether the site is suitable for housing, based on 2 main factors, these being:</p> <ul style="list-style-type: none"> • Relation to the settlement hierarchy • National policy restrictions <p>Sites which are suitable are taken through to be assessed in more detail.</p> <p>Sites with permission automatically go through to stage 2.</p>

Table 6 – Suitability, Availability, Achievability	
Suitability	
Question Title	Explanation

Risk of Flooding	A significant issue for Selby, flooding has been kept separate from other physical constraints. The level of flood risk will be determined by the latest flood risk mapping produced by the Environment Agency.
Physical Constraints	An assessment of any other physical constraints that would need to be overcome through the planning application process e.g. access to the site, infrastructure, proximity to listed buildings and conservation areas, neighbouring uses, proximity of waste water treatment works, drainage options (surface water and foul sewage), Internal Drainage Board district, topography, mineral designations, etc. ground conditions, hazardous risks, pollution or contamination
Overcoming suitability constraints	A range of potential solutions for any constraints
Availability	
Submitted by?	Upon request a distinction will be made between landowners and major land promoters. Whether the site has been submitted by a landowner or an agent, and whether there is a developer involved. This question will not feature any names, addresses or personal details of any kind.
Availability Considerations	Whether the site has a history of unimplemented planning permissions. The number of landowners there are on the site. Impact of the existing land use of the site on availability. Impact of any land ownership constraints or any third party land required.
Overcoming availability constraints	A range of potential solutions for any constraints
Achievability	
Is the site economically viable?	Developer interest in the site can demonstrate that it is economically viable, along with a recent history of planning applications showing developer intent.
Overall Deliverability	Depending on the evidence submitted in the suitability, availability and achievability sections, a site will be given a deliverability timescale, these being:

	<p>0-5 years- no constraints to deliverability, or constraints can be mitigated. Units will be projected from the start of the supply period.</p> <p>6-10 years – constraints have been found that will take time to be mitigated, or the site is part of long term phase. Units will be projected from year 6 of the plan period.</p> <p>11-15 years – significant constraints have been found that will take significant time to be mitigated, or the site is part of long term phase. Units will be projected from year 11 of the plan period.</p> <p>Not deliverable – the constraints on the site cannot be mitigated against, and the site is held in abeyance, no units from this site will be projected in the supply.</p>
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Table 7 – Estimating the Development Potential	
Question Title	Explanation
Date of permission	The date the notice of decision was issued, should the site have planning permission.
Permission started?	An indication as to whether works have commenced on-site, should the site have planning permission.
Permission Expiry Date	The date the permission will expire (lapse), should the site have planning permission. Some sites with outline permission had reserved matters applications submitted before their expiry date, at the time of this assessment. The outline application remains extant while the reserved matters application is being processed and this is noted here.
Net Developable area ratio	<p>The area of the site considered purely developable for housing (%)</p> <p>Sites with planning permission have already had their developable area approved through the development management process.</p>
Net Developable area (ha)	The area of the site in hectares (ha) considered developable

Build rate	The annual rate at which dwellings are built out on the site. Where there is more than one developer on site, this will be noted and will increase the rate of building.
Lead in time (years)	The time from the point of approval of a planning application, to the expected completion of the first plot.
Density	The number of dwellings which can be built on the site per hectare (ha) of the site area. Sites with planning permission have already had their density approved through the development management process.
Greenfield capacity	Number of units on the site that are estimated to be delivered on the greenfield sections of the site.
Previously Developed Land capacity	Number of units on the site that are estimated to be delivered on the previously developed sections of the site.
Gross capacity	The estimated number of dwellings that can be accommodated onto the net site area. For sites with permission, this number represents the total number of dwellings given by the most recent permission on the site.
Net Capacity	For sites with permission, this will be the gross capacity, minus any demolitions/ mergers/ changes of use associated with the permission that result in the loss of dwellings.
Deliverable Capacity remaining	In the case of sites with planning permission, this figure shows the remaining number of dwellings still to be complete if development has already started. This figure will be the same as net capacity for all other types of sites. Sites assessed as undeliverable will be given zero for this question.
Dwelling projections	A series of cells that project how the units from the site will be built out across the plan period, taking into account the lead in times and build out rates mentioned above.

Development Timescale	How long the site will take to complete all its units in years
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Questions:

12. Are these questions appropriate for the assessment?

13. Are there any questions which are unnecessary?

14. Are there any other questions we could include?

9. Next Steps

- The SHLAA working group have until 5pm on Tuesday 18th June 2024 to make comments.
- An updated finalised methodology (featuring working group comments and our responses to them) will be sent to the working group.
- Sites within the SHLAA will then be assessed with the methodology.
- The results of the assessment will be sent to the working group, who will have 2 weeks to comment.
- The SHLAA will then be used to inform the assessment of the Council's housing land supply for the Selby district from the period 2024-25.

Responses to the SHLAA Methodology Working Group Paper

Table 8: Responses from the working group to the methodology		
Respondent	Summary of Comments	Council Response
Charlotte Gill (York Consortium Drainage Boards)	<p>Thank you for the opportunity to comment on the methodology. From the Board's perspective, I can see that the risk of flooding is already included as part of the "Suitability" section and that drainage options (for both surface water and foul sewage) is included in the "Physical Constraints" section also. Accordingly, we have no further comments.</p>	<p>Thank you for submitting comment in response to the 2024 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted.</p>
Simon Jones (National Highways)	<p>I've received the consultation with thanks, and whilst the 2 week deadline for comments is noted, the formal response of National Highways will be received towards the end of June/Start of July – in line with SCI guidance and our own resourcing.</p> <p>You will no doubt have seen my reply on the SHLAA (as was) around 12 months ago, and whilst the principle of my comments won't change for this latest consultation, the Council has since removed the Heronby site allocation and this will mean numerous smaller housing sites spread over a wider area in the district to make up the deficit. Therefore a new consideration will now be how you will account for the aggregated impact on the Strategic Road Network caused by these sites, and how the Council will bring a methodology forward to mitigate that and apportion necessary costs against each of those in order to achieve a 'no worse off' position.</p> <p>I shall endeavour to send the comments back sooner, however the deadline set is unrealistic. When my comments are sent through, these should be read alongside my most recent letter which was received by the Council on 17th April 2024 concerning the 'PRE-SUBMISSION REVISED PUBLICATION SELBY LOCAL PLAN'.</p>	<p>Thank you for submitting comment in response to the 2024 Selby district SHLAA Draft Methodology consultation.</p> <p>We look forward to receiving your updated comments.</p>

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	<p>In each of my continuing responses on behalf of the Secretary of State for Transport, I offer to meet and discuss the issues I raise with yourselves in the hope that the Council can then proactively address these alongside ourselves – negating problems for the EiP further down the line</p>	
<p>Ben Parks (Savills obo Caddick Group)</p>	<p>1. Does the working group agree with these types of sites as a viable source to populate the 2024 SHLAA?</p> <p>No. The SHLAA needs to distinguish between Deliverable sites (which can count towards the Five Year Housing Land Supply) and other potential sites. Deliverable sites need to be in the context of the definition of the NPPF:</p> <ul style="list-style-type: none"> a) <i>sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).</i> b) <i>where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.</i> <p>Therefore, Allocations from Local Plans that are over 10 years out-of-date and do not have detailed planning permission should not be considered deliverable unless there is specific clear evidence that housing completion will begin within 5 years, as per the NPPF definition of 'Deliverable'. Outline permissions should also have clear evidence (e.g. a housebuilder on board) to demonstrate the site is deliverable.</p>	<p>Thank you for submitting comments in response to the 2024 Selby district SHLAA Draft Methodology consultation.</p> <p>In line with the NPPF definition of 'Deliverable', any residential allocation from the existing Local Plan will include additional evidence regarding the site's deliverability.</p>
	<p>2. Is the definition of developable area appropriate? The definition of Developable Area is appropriate.</p>	<p>Comment noted.</p>

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	<p>3. What are your thoughts on the proposed developable area ratios? and 4. Are the brackets of site sizes appropriate?</p> <p>The developable areas are appropriate for sizes of 10 and below but is inaccurate for 'more than 10 dwellings'.</p> <p>It is also important to consider the effects that requirements for on-site biodiversity net gain will have on reducing the developable areas of all sites. The developable areas of sites from 2018-2024 won't account for this reduction in developable area. Moreover, the category of 'more than 10 dwellings' lacks distinction between sizes. There should be a separation of developments between 11-50 dwellings, and for developments between 51-100 dwellings and developments over 100 dwellings. However, we note the current sample size of data is too small to reflect these differences.</p> <p>Through our experience of delivering major developments, we consider that major sites (100+ dwellings) lose a large amount of the developable area to additional uses such as open space and landscaping which smaller sites do not.</p> <p>As such we propose an additional two brackets for larger sites:</p> <ul style="list-style-type: none"> - 11-50 dwellings: 75% - 51-100 dwellings: 70% - 100+ dwellings: 60%. <p>It should be noted that there is an outlier in the 'developable area' data in the accompanying Excel SHLAA Working Group Data 2024, with 'Low Street Persimmon' (row 230) being stated as 100% net developable area. This is evidently an error as the development has a large portion of open space and as such cannot be a 100% developable area.</p> <p>If this erroneous site is removed the net developable area would equate to an average of 74% net developable area.</p>	<p>Biodiversity net gain is likely to not always be consistent as sites, such as brownfield sites, are not required to account for BNG. Further, developers also have the opportunity to buy off-site BNG units. Due to these factors, the rates and consistency of developer contributions to BNG are yet undetermined and it would therefore not be appropriate to reduce the rate of net developable area of sites based on these uncertainties at this time.</p> <p>The recent data provided in the local area does not represent the suggested recommendations.</p> <p>Error has been rectified in the data.</p>

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	<p>5. Should sites be grouped by other factors?</p> <p>No, the sites are grouped Appropriately.</p>	Comments noted.
	<p>6. What are your thoughts on the density rates proposed for sites without permission?</p> <p>Density requirements are not fully reflective of the average densities achieved with the average density in Sherburn in Elmet (where the vast majority of development has been achieved for Local Service Centres) achieving a density of 6 dph lower than the proposed density. This density should be reduced to 30. Similarly, the achieved Greenfield density has been 30, and therefore the proposed density should also therefore be 30.</p> <p>Future densities will be reduced by greater strengthening on building standards, including for climate change and adaptability of dwellings. Densities from 2016-2024 are not reflective of these changes and should be seen as maximum achievable levels.</p>	The proposed densities outlined in Table 2b are averages of sites that have been granted permissions between 2016 and 2024, the rates are not set maximums.
	<p>7. Are there particular locations which require higher density levels – for example urban brownfield sites?</p> <p>The only suitable example is brownfield land in Selby town which is already captured in the existing table.</p>	Comment noted.

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	<p>8. What are your thoughts on the parameters for the lead in times and on the presumptions we have made?</p> <p>The implementation of sites is increasingly adversely affected by limited power and drainage capacity, both of which can only be resolved by the respective network operators carrying out infrastructure improvements. Given that the design and delivery of these and other utilities infrastructure improvements only proceed once sites have been granted planning permission this is now significantly extending the lead in times for larger sites. We therefore suggest that table 3b is extended to differentiate between small, medium and large sites, with extra columns as follows:</p> <table border="1" data-bbox="421 676 1426 1251"> <thead> <tr> <th colspan="5" data-bbox="421 676 1426 738">Table 3b – Proposed Led in times (Months)</th> </tr> <tr> <th data-bbox="421 738 629 839">Type of site</th> <th data-bbox="629 738 831 839">1 to 10 dwellings</th> <th data-bbox="831 738 1025 839">11 to 50 dwellings</th> <th data-bbox="1025 738 1227 839">51 to 200 dwellings</th> <th data-bbox="1227 738 1426 839">201+ dwellings</th> </tr> </thead> <tbody> <tr> <td data-bbox="421 839 629 975">Reserved matters/full planning</td> <td data-bbox="629 839 831 975">12</td> <td data-bbox="831 839 1025 975">18</td> <td data-bbox="1025 839 1227 975">18</td> <td data-bbox="1227 839 1426 975">18</td> </tr> <tr> <td data-bbox="421 975 629 1110">Outline planning permission</td> <td data-bbox="629 975 831 1110">18</td> <td data-bbox="831 975 1025 1110">24</td> <td data-bbox="1025 975 1227 1110">30</td> <td data-bbox="1227 975 1426 1110">36</td> </tr> <tr> <td data-bbox="421 1110 629 1251">Sites without planning permission</td> <td data-bbox="629 1110 831 1251">24</td> <td data-bbox="831 1110 1025 1251">30</td> <td data-bbox="1025 1110 1227 1251">36</td> <td data-bbox="1227 1110 1426 1251">40</td> </tr> </tbody> </table> <p>Moreover, sites without planning permission should not be considered deliverable unless there is clear evidence for their deliverability – this evidence should be used to assess the potential lead in times. In particular, consideration needs to be given to</p>	Table 3b – Proposed Led in times (Months)					Type of site	1 to 10 dwellings	11 to 50 dwellings	51 to 200 dwellings	201+ dwellings	Reserved matters/full planning	12	18	18	18	Outline planning permission	18	24	30	36	Sites without planning permission	24	30	36	40	<p>Calculation of lead in times is based off of the analysis of recent completions within the local area. The suggested recommendations do not align with the trends of the local area.</p> <p>The data provided utilises recent information on lead in times, however it is recognised that each site is different and there are a range of factors that can affect the lead in time of a site. This is why site promoters, agent and landowners are allowed to submit their own lead in times during the consultation process.</p>
Table 3b – Proposed Led in times (Months)																											
Type of site	1 to 10 dwellings	11 to 50 dwellings	51 to 200 dwellings	201+ dwellings																							
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	<p>national delays in the planning system which can hold up applications. Therefore, we think these dates for sites without planning permission are overly optimistic.</p> <p>In former SHLAAs, there are a number of sites without planning permission that have taken considerably longer than 30 months, or never been delivered. For instance, Land at Crosshills Lane has been included for delivery in the previous four SHLAAs but has yet to even achieve planning permission.</p>	
	<p>9. Are the sizes of sites appropriate?</p> <p>The size of sites are appropriate.</p>	Comment noted.
	<p>10. Are the build rates appropriate?</p> <p>Build rates are optimistic for sites over 50 dwellings with each category being rounded up. In particular, the 201+ average is a combination of both sites with 1 and 2 developers on board yet is still lower than the proposed build out rate when there is one developer on board. We recommend reducing this build rate with one developer on board to 40. There is limited difference between sites 101-200 dwellings and those that are 200+ if only one developer is on board.</p>	In order to analyse the data forensically, the presence of two developers on a site must be taken into account. Two developers present on a site result in quicker build out of the site, particularly when developing two different products.

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	<p>11. Should location be factored into the assessment?</p> <p>No there is not sufficient variation in locational build rates for it to be justified to be included in the assessment.</p>	Comment noted.
	<p>12. Are these questions appropriate for the assessment?</p> <p>Yes the questions are appropriate for the assessment.</p>	Comment noted.
	<p>13. Are there any questions which are unnecessary?</p> <p>No the questions are all appropriate.</p>	Comment noted.
	<p>14. Are there any other questions we could include?</p> <p>Yes, all sites are now required by The Environment Act to demonstrate a +10% Biodiversity Net Gain. This may impact the suitability and/or the net developable area on the sites. This should be considered as a physical constraint.</p>	<p>Biodiversity net gain is likely to not always be consistent as sites, such as brownfield sites, are not required to account for BNG. Further, developers also have the opportunity to buy off-site BNG units.</p> <p>Due to these factors, the rates and consistency of developer contributions to BNG are yet undetermined and it would therefore not be appropriate to reduce the net developable area of sites based on these uncertainties at this moment in time.</p>
Mark Johnson (Johnson Mowat)	<p>Many thanks for sending through the Methodology.</p> <p>We have seen this document many times over recent years and once again look forward to being involved in the data review as the next stage. At this moment in time, we have no remarks to make on the Methodology.</p>	<p>Thank you for submitting comment in response to the 2024 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted.</p>
Sally Wintle	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the</p>	<p>Thank you for submitting comment in response to the 2024 Selby district SHLAA Draft Methodology consultation.</p>

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(Natural England)	<p>benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We recognise that SHLAAs form a critical component of the evidence base for Local Plans. In order to allocate the most appropriate sites to deliver high quality, sustainable development, environmental issues and opportunities should be considered as an integral part of the assessment process.</p> <p>Natural England is unable to provide bespoke advice on SHLAAs or attend meetings in connection with them. In line with the National Planning Policy Framework (NPPF), we offer the following generic advice on key natural environment considerations for use in producing or revising SHLAAs, which we hope is of use.</p> <p>1. Landscape Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes.</p> <p>Impacts of new housing upon landscape may be positive or negative, direct or indirect, short or long term and reversible or irreversible. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.</p> <p>The assessment of potential housing sites should be informed by the landscape character approach. The National Character Area (NCA) profiles will provide useful information. These update the national framework of Joint Character Areas and Countryside Character Areas that are used to inform LCAs. Further information is available at NCAs</p> <p>Landscape Character Assessments (LCAs) identify the different landscape elements which give a place its unique character and can help inform the location and design of new development. Further information on LCAs is at Landscape Character Assessment.</p> <p>More detailed study (e.g. Landscape and Visual Impact Assessment) of the sensitivity of the landscape and capacity to accommodate change may be necessary to determine the suitability of potential housing sites, particularly those within or near protected landscapes.</p> <p>Seeking opportunities to contribute to landscape restoration and enhancement.</p>	Your comments have been noted.

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	<p>Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on planning authorities to seek to further the statutory purposes of protected landscapes. The NCA profiles identify potential opportunities for positive environmental change. LCAs also set out opportunities for landscape restoration and enhancement. These can help identify potential opportunities for housing developments to contribute to landscape enhancement in an area. National Park and AONB Management Plans may also set out relevant enhancement measures.</p> <p>2. Biodiversity Avoiding harm to the international, national and locally designated sites of importance for biodiversity.</p> <p>International sites comprise: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites¹</p> <p>¹ As set out in paragraph 187 of the NPPF, the following wildlife sites should also be given the same protection as habitats (European) sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on habitats sites. . National sites include biological Sites of Special Scientific Interest (SSSIs, National Nature Reserves (NNRs) and Marine Conservation Zones. Local Sites include Local Wildlife Sites and Local Nature Reserves.</p> <p>The potential impacts of new housing upon such sites may be positive or negative, direct or indirect and short or long term. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.</p> <p>Indirect impacts may be experienced several kilometres distant from new housing e.g. water pollution. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites.</p> <p>Impact Risk Zones (IRZs) are a GIS tool that can be used by LPAs to consider whether a proposed development (or allocation) is likely to affect a SSSI. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Information about using this data can be found here.</p>	

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	<p>The Magic website is a useful source of information on the location and qualifying features of the international and national designations. Local Environmental Records Centres should also be of assistance and often hold information on Local Sites.</p> <p>Avoiding harm to irreplaceable habitats, priority habitats, ecological networks and priority and/or legally protected species populations</p> <p>Impacts on irreplaceable habitats, including ancient woodland and ancient and veteran trees, should be considered in line with paragraph 186 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees.</p> <p>Priority habitats and species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk.</p> <p>Consideration should be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.</p> <p>Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.</p> <p>Ecological networks are coherent systems of natural habitats organised across whole landscapes to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.</p> <p>It may also be necessary to undertake a basic ecological survey in order to appraise the biodiversity value of any potential development site. A Phase 1 Habitat Survey is the commonly used standard for habitat audit and provides a starting point for determining the likely presence of important species. More information is available here Phase 1 Habitat Survey.</p>	

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	<p>Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement.</p> <p>Housing development should provide net gains for biodiversity in line with the NPPF paragraphs 180(d), 185 and 186. Major development must deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is due to be extended to smaller scale development in spring 2024. Further information on biodiversity net gain, including planning practice guidance, can be found here.</p> <p>The statutory Biodiversity Metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites, the Small Sites Metric may be used.</p> <p>The mitigation hierarchy as set out in paragraph 186 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.</p> <p>Local Nature Recovery Strategies will also set out biodiversity opportunities.</p> <p>Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 74, 108, 124, 180, 181 and 186). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.</p> <p>Natural England’s Environmental Benefits from Nature Tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts.</p> <p>There is further information in Planning Practice Guidance for the natural environment.</p> <p>3. Green Infrastructure Seeking opportunities to provide for green infrastructure.</p> <p>Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It can provide multiple benefits</p>	

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	<p>including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health and well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.</p> <p>The SHLAA should consider the availability of GI and opportunities to enhance GI networks in line with any GI strategy in the area when considering sites for development. Further information of green infrastructure is set out in Natural England's Green Infrastructure Framework which provides evidence-based advice and tools on how to design, deliver and manage GI. Development should be designed to meet the 15 Green Infrastructure Principles. The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Further information is set out in the Planning Practice Guidance on Green Infrastructure</p> <p>4. Geological conservation Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites).</p> <p>The MAGIC website includes information on the location and qualifying features of geological SSSIs. Local Environmental Records Centres should also be of assistance and often hold information on Local Geological Sites. Housing development may present opportunities for the enhancement of geological sites e.g. exposure sites in road cuttings.</p> <p>5. Best and Most Versatile Agricultural Land Avoiding Best and Most Versatile Agricultural Land</p> <p>Land quality varies from place to place. Information on Best and Most Versatile Agricultural land (grades 1,2 and 3 a) is available from the Agricultural Land Classification (ALC). ALC maps are available on the MAGIC website. Not all land has</p>	

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	<p>been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites. Further information is available here ALC.</p> <p>6. Public rights of way and access Seeking opportunities to enhance public rights of way and accessible natural green space.</p> <p>Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way. Opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails, in line with NPPF paragraphs 104 and 180. Further information on National Trails is available at www.nationaltrail.co.uk</p> <p>Accessible natural greenspace should be provided as an integral part of development. Housing should make provision for appropriate quantity and quality of green space to meet identified local needs and opportunities as set out in paragraph 102 of the NPPF. GI mapping resources are available here and here. These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision. Existing open space should not be built on unless the tests of NPPF paragraph 103 have been met.</p>	
<p>Melanie Lindsley (The Coal Authority)</p>	<p>Thank you for your notification of the 3rd June 2024 seeking the views of the Coal Authority on the above.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the Selby area there are recorded coal mining features present at surface and shallow depth including; mine entries, fissures and reported surface hazards. These features may pose a potential risk to surface stability and public safety.</p> <p>As you will be aware we provide the LPA with downloadable GIS data in respect of Development Risk (high and Low Risk areas). We would expect all sites being</p>	<p>Thank you for submitting comments in response to the 2024 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted.</p>

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	<p>considered for potential development (allocation) to be assessed against this data. Some features, including mine entries and fissures, have implications for surface development. In cases where these features are present on a site we would recommend that built development avoids being located over these features and their zones of influence. These features can therefore have implications for the quantum of development that can be accommodated on a site.</p> <p>Although I note a list of sites has been provided unfortunately we do not have the resources to review each site in detail, due to the volume of sites involved. However, if you have a smaller number of more strategic sites you would like us to provide more detailed commentary on please let me know.</p>	
<p>James Langler (Historic England)</p>	<p>Historic England is the Government’s statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England’s historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>Thank you for consulting Historic England on the above document. Please find below our comments on the draft SHLAA Methodology 2024.</p> <p>We welcome the reference made to the potential for historic assets on a site to reduce the net developable area. This decision will need to be made on a case by case basis, giving careful consideration of the nature, extent and significance of the heritage asset, or assets, in question.</p> <p>Given the abnormally high densities identified for Tadcaster under Table 2a due to the small sample size for permissions in the town, we suggest that consideration should be given to typical densities of existing built up areas within, and on the periphery of, Tadcaster as a more reliable indicator of appropriate densities.</p>	<p>Thank you for submitting comments in response to the 2024 Selby district SHLAA Draft Methodology consultation.</p> <p>Your comments have been noted.</p> <p>Heritage Assets are considered under physical constraints and a range of possible solutions are recommended in the questions ‘Overcoming suitability constraints.’ This will be more clearly outlined within the methodology as suggested.</p>

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	<p>We also welcome the inclusion in Table 5: Basic Assessment Questions of Scheduled Monuments, Registered Battlefields and Registered Parks and Gardens as national policy restrictions. However, at present, it is unclear where the implications of a site containing one or more listed buildings, or being located within a conservation area, would be considered in the assessment of the suitability/achievability of a site. As the presence of these categories of designated heritage assets may not necessarily preclude a site from development but may restrict what can be delivered, it would seem sensible to consider them as a potential constraint under the 'Suitability' section of Table 6: Suitability, Availability, Achievability.</p>	<p>The proximity of a site to listed buildings and conservation areas has been added into Table 8: Suitability, Availability, Achievability, Deliverability under section 'Physical Constraints' as suggested.</p>

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Simon Jones (National Highways)	<p>Thank you for engaging with National Highways and providing us with the opportunity to comment on the North Yorkshire Council (Selby area) Draft SHLAA Methodology 2024 Consultation.</p> <p>This response initially refers to the relevant policy requirements and guidance, and then moves onto responding to the questions raised within your consultation.</p> <p><u>Policy and guidance</u> With regards to National Highways' approach to development, we would like to refer to key sections from the DfT's Circular 01/2022: 'Strategic road network and the delivery of sustainable development'. <i>Paragraph 12 of the Circular states that new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. This paragraph also states that developments in the right places and served by the right sustainable infrastructure delivered alongside or ahead of occupancy must be a key consideration when planning for growth in all local authority areas.</i> <i>Paragraph 26 of the Circular states that the NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and in development proposals so that sustainable transport can be promoted.</i> <i>Paragraph 28 also emphasises two other relevant points:</i></p> <ul style="list-style-type: none"> • <i>The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods.</i> • <i>The company will work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.</i> <p>Our document 'Planning for the future - A guide to working with National Highways' (October 2023) also explains our general principles for engaging at the plan-making stage, including our priorities for the location of site allocations.</p>	<p>Thank you for submitting comments in response to the 2024 Selby district SHLAA Draft Methodology consultation.</p> <p>Comments noted.</p>

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	<p><i>Paragraph 56 states that the suitability of sites depends on several factors, including local traffic flow, road and transport connections, and options for sustainable travel. Paragraph 57 states that the preparation of plans and strategies provides an opportunity to support developments that reduce the need to travel, minimise journey lengths, encourage sustainable travel, and promote accessibility for all. Paragraph 61 reiterates the policy requirement in DfT Circular 01/2022 for development to be promoted at locations that are or can be made sustainable. Paragraph 64 explains that whilst allocating land for particular uses is a matter ultimately for plan-making authorities, we will provide comment on the suitability of locations where there is potential impact on the SRN, including from a safety, congestion, amenity and carbon emissions perspective.</i></p> <p>Following a review of the provided SHLAA methodology paper, we consider that questions 1-11 are less relevant to us, but we are keen to contribute our views on the other questions relating to Table 5 and Table 6, which explain how you propose to assess the future suitability, availability, and achievability of sites. Within Table 5, we note that your initial assessment on whether the site is suitable for housing, is proposed to be based on 2 main factors, these being:</p> <ul style="list-style-type: none"> • Relation to the settlement hierarchy • National policy restrictions <p>We remain of the opinion that DfT Circular 01/2022 falls within “National policy restrictions”, and we would request that the following additional question is included within this section of SHLAA methodology: “National policy requirements relating to sustainable development”. This will help ensure that the national policy requirements relating to sustainable development are clearly considered within the site assessment process.</p>	<p>The purpose of the SHLAA is to assess sites using a high level but broad criteria. The SA for the Selby Local Plan assess’ matters like these in detail. The introduction of the SHLAA paper and the methodology have been amended to explain this process more clearly. The SA for the new Selby Local Plan can be found here: https://selby-consult.objective.co.uk/kse/event/37850/section/.</p> <p>The need to consider highways sustainability will be factored into the Strategic Housing Availability Assessment for North Yorkshire Council.</p>

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	<p>Within Table 6, you have identified the risk of flooding and a range of physical constraints as factors to consider when assessing the suitability of sites. We consider that only two questions concerning such a wide range of constraints could risk key factors related to the transport sustainability of sites being overlooked. Consequently, and considering the national policy requirements relating to sustainable development, we would request that additional questions are included relating to the site's "access to local facilities" and the site's "access to existing active and public transport networks".</p>	