

**Selby District Council Local Plan Consultation
"PLAN Selby" (The Sites and Policies Local Plan)
Initial Consultation Comments Form**

"PLAN Selby" is the Sites and Policies Local Plan which the Council is developing to deliver the strategic vision outlined in the Core Strategy that was adopted in 2013. When adopted, PLAN Selby will form part of the Local Plan for the District against which planning applications will be assessed.

This consultation is the first stage in our on-going dialogue with you and we hope that you will take time to respond to it and help us move forward. The responses to this consultation will help inform our work and shape the District for the future.

Comments are therefore invited as part of this Initial Consultation.

Please use this form to make your comments.

Please read the main document PLAN Selby and associated papers, which are available on the Council's website at www.selby.gov.uk/PLANSelby and at local libraries and Public Council offices.

You will need to see what is in PLAN Selby in order to make your comments. It contains a wide range of issues and specific questions on which we would like your views. Please make sure you are clear about which part of PLAN Selby you are commenting on and ensure we have your full contact details so we can take your comments into account and so that we can contact you about the next stages.

**Completed comments forms must be received by the Council
no later than 5pm on Monday 19th January 2015**

Contact Details - Please provide contact details and agent details, if appointed

Personal Details

Name: Richard Musgrave

It will be helpful if you can provide an email address so we can contact you electronically

Comment(s)

Please ensure you provide reference to the Question and Topic area for each comment you wish to make.

Topic / Chapter: Chapter 1

Question no.: 4

Paragraph:

Comment:

Having read a number of large scale consultations of this sort, the 'Plan Selby' document is relatively user friendly however I am concerned that this consultation has been held over the Christmas period which means that, despite the two week extension to the consultation, Parish Councils and members of the public will not be as engaged as could have been the case. Each of the five Parish Councils meetings that I have attended in January 2015 has included a discussion 'Plan Selby' but do not have the resources to develop a full reply in the timescales given.

I'd expect this to result in fewer replies than would be expected, which would be disappointing given the importance of the subject matter.

There is no doubt that large developers have far more resources available to them to reply to these sorts of consultations and it is important that community interests are represented as well as commercial ones.

It also has to be said that the form which is to be filled out in is very difficult to use and can't be saved in the format which I have downloaded. This is very inconvenient.

Topic / Chapter: T1 Providing Homes

Question no.: 7b

Paragraph:

Comment:

Whilst I agree with the broad principles of the calculation method proposed in Table 2, the number of completions and approvals since April 2011 for each of the Designated Service Villages isn't specified. The Council should calculate this figure for each of the DSVs and then deduct it from the eventual allocation to arrive at a net allocation for that DSV, rather than treating the DSVs as an amalgamated group.

Topic / Chapter: T1 Providing Homes

Question no.: 8

Paragraph:

Comment:

Question 8a

Selby District Council's Core Strategy Policies 2 and 4 are currently considered to be 'out of date' due to a lack of a five year land supply for residential housing. It is inevitable that some of the allocated sites will not be delivered and so, to counter the problem of persistent historical problem of under delivery of housing numbers, the Council should allocate more sites than are necessary in order to ensure that the independently verified figure of 450 houses per annum (plus any additional buffer required) will be achieved. This will give the Council some control over future development rather than allowing an ad hoc approach to develop.

Question 8b

The question is rather poorly phrased however I think it suggests that consideration is being given to the phasing of sites over the plan period. This approach has not worked well in the past and shouldn't be adopted now. Any further interference in market processes such as this will inevitably reduce the supply of housing in the District.

Question 8c

It is important to remember that the independently verified figure of 450 units pa, or 7200 over the life of the plan, is the minimum figure required. In my reply to 8a, I have already stated that the Council should over allocate sites in order to ensure that the appropriate housing supply is delivered. However the Council should resist the temptation as far as possible to manage the delivery of these sites and should instead review all applications (whether for allocated sites or not) on their own merits as they are presented.

Topic / Chapter: T1 Providing Homes

Question no.: 9a

Paragraph:

Comment:

A simple percentage growth is the fairest way to allocate housing numbers to each of the DSVs, rather allocate an equal number to each of them. This will allow for proportionate growth in each of the DSVs and sites can then be identified to meet that growth. However the Council should also review the actual number of houses that have been delivered in each of the DSVs to ascertain whether some of the DSVs have taken disproportionate growth in recent years. If that is the case consideration should be given to allocating more houses to those DSVs which have historically 'under delivered' and fewer to those that have 'over delivered'.

Topic / Chapter: T1 Providing Homes

Question no.: 13b

Paragraph:

Comment:

It is important that the Traveller community is treated fairly and equally with the settled community. In particular that means that the same planning rules should apply to applications for the traveller sites in the open countryside as they would for residential housing. This will ensure that the Traveller community can access services (education, healthcare, etc) in the same way that the settled community can.

The lack of traveller sites in the District should not be considered in itself 'very special circumstances' which will outweigh the harm to the green belt of allowing Traveller sites to be developed in the green belt.

As a general rule smaller sites should be preferred as they are safer and easier to manage and this is consistent with Government guidance. It is also important that any proposed developments are proportionate to the surrounding area, i.e. they should not dominate the settled community where they are located.

The Council should therefore aim to identify a number of smaller sites across the District.

Topic / Chapter: T3 Defining Areas for Promoting Development and Protecting Key Assets

Question no.: 22

Paragraph:

Comment:

The current development limits are now rather historic and completely arbitrary. As a Member of Planning Committee these arbitrary limits (for example, the development limits often cut through the middle of gardens or potential development sites) are a blocker to delivering houses in the District as the development limits are given significant weight in Officer reports. That comment is not meant as a criticism of the Officers, rather it is made to highlight the absurdity of the current development limits. A review of all development limits to allow for planned growth and some windfall sites should be undertaken urgently as part of this process to significantly boost housing numbers as the Council is compelled to do by the NPPF.

Topic / Chapter: T3 Defining Areas for Promoting Development and Protecting Key Assets

Question no.: 23b

Paragraph:

Comment:

The strategic gap between Church Fenton village and the Airbase should be maintained as it currently is.

Topic / Chapter: T5 Climate Change and Renewable Energy

Question no.: 26

Paragraph:

Comment:

Question 26a

The target at SP17 should not be revised because it is irrelevant. Ideally it would be removed from SP17 and replaced by a policy that is designed to maximise renewable/low carbon energy in such a way that it minimises the adverse impact on the district. If we could generate another 1000 MW from biomass, why would we want to have 100 x 410 foot high turbines with a capacity of only 250MW instead of or as well.

Question 26b

The Council should not set policies which exceed national standards so the 10% target should be removed and replaced by one which encourages solar on existing roofs and encourages other energy resource efficiency such as heat pumps and biomass, but not to do this in such a way that it is dependent on the level of subsidy. This matter is covered by paragraph 95 of the NPPF and does not need additional statements.

Question 26c

The Council should not set policies where the matter is already dealt with by a national standards. The inclusion of the term "subject to viability testing" clearly indicates that there is an expectation that it will increase costs. It will also create work that is not required in other districts and make Selby less attractive to developers.

Question 26d

The Council should not identify areas for wind farms and solar farms because to do so would not limit them to those areas because developers would still be able to propose them on any other site.

Question 26e

Setting minimum distances is the best way to protect residents from the worst effects of wind turbines however a one size fits approach would be unreasonable as it would exclude all turbines, including smaller turbines, from most of the District. Instead the minimum distance should be linked to the size of the proposed turbine and would protect communities as turbines get bigger.

The number of turbines should also be factored into consideration and it should not be permissible to have more than one turbine at the minimum distance. Minimum distances should be set for distances from roads, pathways, public areas and areas used for recreational activity as well as homes.

Question 26f

It is important that any work done has value and deals with genuine issues. Any policies must be cost effective in dealing with issues that affect numerous planning applications. Possible subjects that could be considered include

- Cumulative issues of incineration - traffic and air quality
- Solar farms - visual impact and enclosure of open space
- Wind turbine cumulative visual impacts

Question 26g

The Council should develop an SPD that includes guidance on:

- Minimum separation distances for turbines
- Amplitude modulation noise conditions for wind farms
- Fencing and enclosure issues to do with solar farms.
- Incinerators
- Anaerobic digesters

The Council have set out a vision:

“By 2027 Selby will be a distinctive Rural District with an outstanding environment, a diverse economy and attractive towns and villages. Residents will have a high quality of life and there will be a wide range of housing and job opportunities to help create socially balanced and sustainable communities, which are less dependent on surrounding towns and cities.”

Landscape polices should be put in place if this vision it to be delivered.

Topic / Chapter: Chapter 4 Development Management Policies Discussion and review of SDLP policies

Question no.: 32

Paragraph:

Comment:

If by 'parking standards' it is meant as the minimum number of off street parking spaces that should be provided for each new housing unit then the Council should give this consideration. As a Member of Planning Committee the lack of parking provided with housing units is a source of constant agitation and should be addressed via this Plan if possible.

Topic / Chapter: Chapter 4 Development Management Policies Discussion and review of SDLP policies

Question no.: 33a and 33b

Paragraph:

Comment:

Good design and neighbouring amenity are in large part down to personal subjective interpretation however the NPPF regards good design and good planning as being inextricably linked. Plan Selby should have regard to this. However it should be remembered Selby District has historically under delivered on housing numbers and additional hurdles to development (over and above the requirements of the NPPF) should not be too onerous as to deter potential developers.

Topic / Chapter: Chapter 4 Development Management Policies Discussion and review of SDLP policies

Question no.: 34

Paragraph:

Comment:

Question 34b

Paragraph 28 of the NPPF has a far wider scope regarding rural economic development in respect of leisure and tourism than is suggested in your paragraph 4.16. It should also be noted that Communities already have the ability to protect assets of community value under the Localism Act 2011.

Question 34c

Significant encouragement is already given to the development of leisure and tourism businesses in the Core Strategy and the NPPF, and the implementation of such is largely a Development Management issue. To give this further weight perhaps the Council should take a proactive approach to promoting these sort of applications via a special category of allocations?

Topic / Chapter: Chapter 4 Development Management Policies Discussion and review of SDLP policies

Question no.: 35

Paragraph:

Comment:

In Selby District there are many previously developed but now redundant sites in the open countryside which could be developed but don't fall into the categories that are listed in your question, e.g. not all former barns in the open countryside are suitable for conversion however allowing such buildings to be replaced could reduce the impact in the open countryside and improve the visual amenity.

Topic / Chapter: Chapter 4 Development Management Policies Discussion and review of SDLP policies

Question no.: 36

Paragraph:

Comment:

The Council should take a proactive view to identifying and discussing the future use of previously developed sites in the open countryside, these sites could be a valuable resource for the area.

Topic / Chapter: Chapter 5 Settlements

Question no.: 41a and 41b

Paragraph:

Comment:

Question 41a

I am pleased to hear that Appleton Roebuck and Acaster Selby Parish Council are developing a Neighbourhood Development Plan. If adopted this will sit alongside the Council's Plan and be given significant weight when determining planning applications. Time should be allowed through the Plan Selby process for this Neighbourhood Plan to be developed as it will guide the future development of the village.

Question 41b

Over the last few years there has been demand for a children's play area in the village however no land has been forthcoming despite the Parish Council holding significant funds to develop a play area from Section 106 monies. Consideration should be given to allocating a site in the village for recreational open space.

Topic / Chapter: Chapter 5 Settlements

Question no.: 47a

Paragraph:

Comment:

I notice that Church Fenton Airbase is being considered as a secondary village with its own development limits in the Plan and must question why this is the case. At best this is disingenuous of Selby District Council. The Airbase is largely in Ulleskelf Parish but, in reality, would be served mainly by Church Fenton village. There have been 93 dwellings approved since April 2011 in this area and a mechanism should be agreed to split this number between the two villages and deduct the agreed figure from the respective allocation. To do otherwise would be unfair and anomalous.

Topic / Chapter: Chapter 5 Settlements

Question no.: 57a

Paragraph:

Comment:

I notice that Church Fenton Airbase is being considered as a secondary village with its own development limits in the Plan and must question why this is the case. At best this is disingenuous of Selby District Council. The Airbase is largely in Ulleskelf Parish but, in reality, would be served mainly by Church Fenton village. There have been 93 dwellings approved since April 2011 in this area and a mechanism should be agreed to split this number between the two villages and deduct the agreed figure from the respective allocation. To do otherwise would be unfair and anomalous.

Additional Comments - Please provide any additional comments you may wish to make.

Comment Submission Statement

All comments must be made in an email or in writing if they are to be considered. Your comments and some personal identifying details will be published in a public register and cannot be treated confidentially. Where practical, personal identifiers may be redacted, however Selby District Council cannot guarantee that all identifiers will be removed prior to publication of consultation records.

Name - or signature:

Date:

Please ensure you save a copy of your completed comments form to your computer before sending by email

Completed comments forms must be received by the Council no later than 5pm on Monday 19th January 2015

Email: ldf@selby.gov.uk

Post to: Policy and Strategy Team, Selby District Council, Civic Centre,
Doncaster Road, Selby YO8 9FT