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BY EMAIL AND POST (ldf@selby.gov.uk)

19099/A3/GF/ac

10th August 2015

Dear Sir/Madam

**'PLAN Selby' – DRAFT STRATEGIC HOUSING MARKET ASSESSMENT
RESPONSE ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND**

We are instructed by our Client, the Church Commissioners for England (the Commissioners), to submit a response to the Draft Strategic Housing Market Assessment (SHMA), to inform the emerging PLAN Selby.

The three Options for growth presented in the draft consultation document have been reviewed and responses are provided below to Question 1 parts b), c), d), e) and h), as detailed on the District Council's website.

Our representations should be read in the context of the land that the Commissioners are promoting for residential development, which lies immediately contiguous to the built up areas of Selby and Brayton in the adopted Core Strategy.

Q1: Do you have any comments on the:

b. trend based demographic projections?

The use of 2012 based household projections as the starting point for calculating the District's objectively assessed housing need is supported as the most up to date data available.

c. economic led projections?

Upward adjustments should be made to objectively assessed housing need to support economic growth, as outlined in the Planning Practice Guidance (PPG).

Adopted Core Strategy Policy SP13 outlines a requirement for an additional 37-52ha of employment land to be provided across the District to 2027, demonstrating a need for a significant amount of employment land, and subsequent creation of jobs, within the District.



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The SHMA indicates that 398 dwellings per annum are required within the District to meet the anticipated job growth of 0.6% per annum. This is based on the level of commuting remaining constant. However, there is currently a significant proportion of both in and out-commuting, as detailed at Table 19 of the SHMA. It is considered that further upward adjustments should be made to reduce in-commuting and improve sustainability, by enabling these households to move into the District through the creation of additional housing.

d. affordable housing need?

As identified in the PPG, upward adjustments should be made to housing requirements to ensure that sufficient affordable housing will be provided to meet local needs.

The starting point for affordable housing need identified in the SHMA is 1,786 households, which are currently in unsuitable housing, or without housing. However, a number of adjustments are made to this figure, including the removal of those households already living in affordable housing (as they would release affordable properties when they move on to more suitable housing) and those who are estimated as having sufficient income to afford market housing. Following these adjustments, it is considered that 582 households currently require affordable accommodation within the District. This current need has been broken down to 25 households per annum at Table 37, although it is unclear how this figure has been derived.

Estimates have then been made regarding the number of newly forming households who will require affordable housing. It is estimated that 266 new households per annum will require affordable housing across the Plan Period. In addition, it is considered that 99 households will 'fall into need' per annum. Overall, it is considered that there is a need for 390 affordable dwellings per annum over the Plan Period.

The SHMA considers that, based on past trends, 218 affordable dwellings will become available per annum. However, this only takes account of figures from the past two years. It appears that this figure takes account of households moving on from existing affordable properties within the District, however, an adjustment has already been made for this in the amount of affordable housing required, as detailed above. It therefore appears that the SHMA takes account of this twice.

The District's affordable housing target of 40% should be considered when calculating the amount of affordable housing which will be delivered over the Plan Period. If, in accordance with adopted Core Strategy Policy SP5, the District's full housing requirement of 450 dwellings per annum was delivered, this would only equate to 180 affordable dwellings per annum, assuming that it was viable for each Site to deliver the full affordable housing requirement.

Notwithstanding our concerns on how affordable need has been calculated as detailed above, the net affordable housing requirement is identified at Table 37 as being 172 dwellings per annum. Conclusions on affordable housing at Paragraph 9.38 suggest that 50% affordable housing is required within the District across over the Plan Period. This is significantly in excess of the adopted Core Strategy target of 40% and does not correspond with the net identified need of 172 dwellings per annum. Indeed Paragraph 9.34 acknowledges that there are affordability pressures, however an overall adjustment of 33 dwellings per annum is made to the overall objectively assessed housing need.

Based on our comments above, it is considered that the net affordable housing need is greater than 172 dwellings per annum and that a significantly greater adjustment to the objectively assessed housing need in the SHMA should be made to reflect this.

e. market signals?

The PPG requires upward adjustments to be made to objectively assessed housing need to reflect market signals. However, the SHMA considers that there is a limited case for making adjustments to the District's objectively assessed housing need on the basis of market signals identified. In respect of this, we have the following comments to make which should be afforded further consideration by GL Hearn as they develop the SHMA:

- Land Values – up to date evidence was used by Peter Brett Associates within the CIL Economic Viability Report and associated Addendum that could be utilised and assessed to ensure that the most robust position is taken account of within the SHMA;
- House Prices – no comment as no clear evidence of worsening situation;
- Rents – evidence of increasing rents which may indicate an imbalance between demand for and supply of housing;
- Affordability – Trend in Lower Quartile House Price to Income Ratio for Selby is above regional and national averages, increasing from 3.6 in 2001 to 6.6 in 2013;
- Rate of Development – current supply falls below planned supply leading to an under-delivery, further exemplified by the current lack of a 5 year housing land supply;
- Overcrowding – evidence indicates increases in both overcrowding and Houses in Multiple Occupation indicting some suppressed household formation and un-met housing need.

Generally, whilst comparison with local and national averages can be relevant, the housing crisis is nationwide and the fact some of the Market Signal indicators in Selby may be better than elsewhere does not mean there is no housing crisis in Selby. Indeed, at least four out of six of the relevant indicators above do demonstrate worsening trends that would warrant an upward adjustment to planned housing numbers over and above that which has been allowed for in the Draft SHMA.

h. draft conclusions?

The adopted Core Strategy identifies a requirement for 7,200 dwellings to be delivered across the District, during the Plan Period from 2011-2027. This equates to 450 dwellings per annum. However, it should be noted that Policy SP5 of the Core Strategy identifies that this is a *minimum* target, which is in accordance with Paragraph 47 of the National Planning Policy Framework, which aspires to '*boost significantly the supply of housing*'.

The Draft SHMA identifies a requirement of 431 dwellings per annum up to 2027 (or 393 dwellings per annum if an extended period to 2037 is considered). Whilst this is broadly in accordance with the adopted Core Strategy target, it is considered that PLAN Selby should continue to be progressed on the basis of a minimum requirement of 450 dwellings per annum, in accordance with Paragraph 47 of the NPPF.

As detailed above, we would question some of the assumptions made in relation to economic projections, affordable housing need and market signals, which are likely to result in an increase in the objectively assessed need calculated for both the Plan Period to 2027 and the extended period to 2037. The aspirations of local communities for the growth of the Market Towns, such as Selby, should also be taken into account.

We trust that you will take our comments into account when considering the methodology for determining the objectively assessed housing need for Selby District. Should you have any questions or would like to discuss our comments in further detail, please do not hesitate to contact me. Otherwise, we look forward to notification of future consultation events in relation to the preparation of PLAN Selby.



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Yours faithfully,

GEMMA FIELD
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cc Emma Kateley – Church Commissioners



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10th August 2015

Dear Sir/Madam,

**'PLAN Selby' – DRAFT STRATEGIC COUNTRYSIDE GAP STUDY
RESPONSE ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND**

We are instructed by our Client, the Church Commissioners for England (the Commissioners), to submit a response to the Draft Strategic Countryside Gap Study to inform the emerging PLAN Selby.

The study has been reviewed and responses are provided below to Question 5 parts a), b) and c), as detailed on the District Council's website.

It is noted from our participation in the PLAN Selby workshops in June and July 2015 that this study is intended to inform, but not predetermine decisions to be made later in the PLAN Selby process on whether Strategic Countryside Gaps (SCGs) should be designated within the Plan. Whilst recommendations in the final Strategic Countryside Gap Study will be a consideration in determining the appropriateness of land for allocations for growth within PLAN Selby, it will not be the only consideration to inform such decisions (Selby District Market Town Study Fact Sheet Revision D).

Our representations should be read in the context of the land that the Commissioners are promoting for residential development, which lies immediately contiguous to the built up areas of Selby and Brayton in the adopted Core Strategy, and within the Strategic Countryside Gap proposed within the draft consultation document.

**Q5: Do you have any comments on the:
a. principle of defining Strategic Countryside Gaps in PLAN Selby?**

Whilst the principle of defining SCGs in PLAN Selby is accepted, the allocating of SCGs boundaries should include some flexibility to ensure that the development required within the District over the Plan Period can be delivered given the other significant constraints to development within Selby District, such as Green Belt and flood risk.

When defining SCGs in PLAN Selby, it is important for a strategic overview to be undertaken first which takes account of these constraints to development, which are considered to be more onerous than the SCG designation. This is of particular relevance given Paragraphs 83 of the National Planning Policy Framework (NPPF) (Green Belt) and Paragraph 101 of the NPPF (flood risk). It is important that the designation of SCGs does not force development into the Green Belt or areas of risk of flooding. A flexible approach should be adopted which protects settlements from coalescence, but also allows for growth in appropriate, sustainable locations without the need for Green Belt release (which should only be permitted in exceptional circumstances in accordance with Paragraph 83 of the NPPF) or areas which are identified as being at risk of flooding (in accordance with Paragraph 101 of the NPPF).

b. methodology used to assess potential Strategic Countryside Gaps?

The Draft Study methodology has reviewed the existing SCGs against the following criteria:

- Preventing the merging of settlements or parts of the settlement?
- Is it open in nature? and
- Whether there is a perception of leaving a settlement or part of a settlement and entering open countryside before entering the next settlement or part of a settlement?

This is considered to be a very simplistic methodology and, whilst assessing whether the principle of the SCG is appropriate in a particular location, there is no detailed consideration of the existing SCG boundaries and whether they remain relevant or are unnecessarily constraining development and should be reviewed.

Section 3.2.4 of the Draft Study considers that the 'intended shape' of settlements and any 'potential pressures' on the SCG have been considered through a review of all consented development. Seemingly no review of the housing requirements established through the adopted Core Strategy or that likely to be delivered through PLAN Selby and how this may influence settlement patterns have been considered as part of the methodology. In addition, it doesn't appear that technical constraints such as flood risk and how this may result in pressures on the SCGs have been considered as part of the methodology. These are critical considerations which should be taken in to account as part of the methodology of the study to inform where SCG boundaries are established.

The Draft Study has been based on a site visit and a high level policy review. It does not appear that any detailed Landscape and Visual Impact work has been undertaken to inform the Draft Study. Such work will also be critical in informing a robust review of both the existing SCGs and their boundaries, as well as any new SCGs.

As detailed above, given the Green Belt and flood risk constraints within the District, it is critical that sufficient flexibility is retained to ensure that the development requirements of the Core Strategy and PLAN Selby can be delivered. Indeed, the Inspector's Report on the examination into the Selby District Core Strategy (19th June 2013) supports the Council's intention to undertake a SCG review, and considers that adjustments could be made to the boundaries of SCGs if they are required for development. The Inspector goes on to confirm that:

"This would allow the merits of retaining the strategic gaps to be factored into consideration of the flood risk, sustainability and other matters relevant to the allocation of land in the wider Selby area." (Paragraph 54)

Given the comments of the Inspector and the significant constraints to development across Selby District, it is important that the boundaries of SCGs in sustainable locations are reviewed as part of this Study and that sufficient flexibility is retained to ensure that development requirements can be met.

c. assessment of each potential SCG?

As detailed above, the Commissioners are promoting land for residential development between Selby and Brayton, within the identified Strategic Countryside Gap. Our response to Question 5 c) therefore focusses on the assessment of the Selby/Brayton SCG within the Draft Study and we have considered the function of the SCG against the three criteria identified above.

It is acknowledged that, in part, the Selby/Brayton SCG is narrow and is necessary to prevent the coalescence of the settlements of Selby and Brayton. However, this is not true of the entire SCG. It is considered that the north western area of land bordering the built up area of Selby and the railway line could be released from the SCG without creating coalescence and impacting upon this purpose of the SCG.

In terms of the openness of the SCG, the Draft Study acknowledges that there are a number of buildings and features located within the SCG including St Mary`s Primary School and associated playing fields, Selby Bowling Club, Parish Church of St Wilfrid Brayton and the Brayton Community Centre. The amount of built development located within the SCG will have an impact on the openness of the SCG and this should be reflected in the assessment.

In terms of the experience of leaving one settlement and passing through an area of undeveloped land before entering another, the ability of the Selby/Brayton SCG to perform this function is impacted upon by the built development identified above. However, this function of the SCG is experienced to a certain extent when travelling along the A19 Doncaster Road between Selby and Brayton. Notwithstanding this, the north westerly part of the SCG is not visible from the A19 given the dense intervening vegetation. As such, it is considered that the north western part of the SCG could be released for development without having a further adverse impact on the ability of the SCG to meet this function.

The assessment of the Selby/Brayton SCG concludes that it meets the three identified functions of the SCG and therefore should remain as previously allocated. However, given the reduced openness of the SCG as a result of existing built development, it is not considered that the SCG does fully meet these functions.

Notwithstanding this, the desire of the District Council to retain a gap between the settlements of Selby and Crayton is accepted in principle. However, this should be balanced against the wider constraints to development across the District and the need to deliver sustainable development in accordance with the requirements outlined in the Core Strategy, as reinforced by the Inspector.

Given the above, and that Selby is identified in the adopted Core Strategy as the most sustainable settlement and main focus for new development, a review of the SCG boundary should be undertaken to allow the flexibility to ensure that sufficient development can be delivered during the Plan Period without compromising other technical constraints. It is considered that the north western area of the SCG, along the railway line and contiguous with the built up area of Selby in particular offers an opportunity for residential development to be accommodated successfully into the landscape without adversely affecting the purposes of the SCG. Whilst there would be a slight reduction in the physical extent of openness (which is already diminished through other built development), any development would not affect the potential for coalescence and would preserve the experience of entering the countryside between settlements along the A19. In addition, there is potential for development to be set within a robust landscape framework to ensure a defined boundary between the settlement edge and new boundary of the SCG. This also has the potential to deliver significant landscape and biodiversity enhancements.

Barton Willmore`s Landscape Planning Team are currently undertaking their own Landscape and Visual Impact Assessment of the north western part of the Selby/Brayton SCG to assist Selby District Council in developing their Draft Strategic Countryside Gap Study further. In addition, this will inform a landscape-led Indicative Masterplan for this part of the SCG to demonstrate how development could be successfully accommodated without adversely impacting upon the identified functions of the SCG.

We trust you will take our comments into consideration and develop the methodology for reviewing the SCGs and securing a flexible approach accordingly. Should you have any queries on the above, please do not hesitate to contact me. Otherwise we look forward to notification of future events in relation to the preparation of PLAN Selby.

Yours faithfully,

GEMMA FIELD
Senior Planner

Enc.
cc Emma Kateley – Church Commissioners

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10th August 2015

Dear Sir/Madam

**'PLAN Selby' – DRAFT METHOD STATEMENT FOR THE DEFINITION OF DEVELOPMENT LIMITS
RESPONSE ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND**

We are instructed by our Client, the Church Commissioners for England (the Commissioners), to submit a response to the Draft Method Statement for the Definition of Development Limits to inform the emerging PLAN Selby.

The study has been reviewed and responses are provided below to Question 6 parts c) and d), as detailed on the District Council's website.

Our representations should be read in the context of the land that the Commissioners are promoting for residential development, which lies immediately contiguous to the built up areas of Selby and Brayton in the adopted Core Strategy.

Q6: Do you have any comments on:

c. the proposed methodology for defining development limits?

In terms of the proposed methodology for reviewing development limits outlined in the Draft Method Statement, it is agreed that there are a number of other emerging Evidence Base documents which need to feed into the review of how development limits will be defined, including the Green Belt Review and Strategic Countryside Gap Study. It is also considered that the process should be informed by a review of areas at greatest risk of flooding. Finally it is agreed that proposed allocations and extant planning permissions should be included within settlement boundaries.

The methodology proposed appears to be based on the Draft Method Statement's recommendation that development limits are drawn tightly around settlements. As such, no allowance in the methodology is made for introducing any flexibility, particularly in the more sustainable settlements such as the Principal Town, Local Service Centres and Designated Service Villages as identified in the adopted Core Strategy. However, Section 3.5 of the Draft Method Statement confirms that the review of development limits will be undertaken as part of the preparation of PLAN Selby and the review will



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be undertaken following a number of studies including those identified above, and the outcomes of these studies will inform the revision of development limits. It is therefore considered that the methodology proposed pre-determines the outcome of these studies and the outcome of this consultation on the approach to defining settlement limits which should be adopted through PLAN Selby.

In terms of the criteria for defining development limits proposed within the Draft Method Statement, it is agreed that boundaries should be well related to the character and built form of a settlement and that alignment where possible with permanent physical features will assist in forming strong boundaries.

Under criteria 2 part d) we would disagree with the statement that field boundaries and tree lines lack durability as boundaries. The methodology states that where possible development limit boundaries should be amended to relate to permanent physical features. However, this is unlikely to be practical in many cases and a more flexible approach, including the consideration of field boundaries and tree lines should also be included.

Where it is not possible for new boundaries to relate to permanent physical features, the methodology should consider the potential for new strong boundaries to be created through the development process, such as through the creation of a new road or the introduction of structural planting.

d. the conclusions about defining 'tight' development limits?

The report recommends establishing tight development limits around the Principal Town, Local Service Centres and Designated Service Villages. However, it is suggested that the approach to defining development limits should be considered on a settlement by settlement basis. Whilst in some circumstances it is agreed that it is more appropriate for settlement boundaries to be drawn tightly around existing built up areas and allocations, in constrained settlements such as those adjoining Green Belt, it is considered that a more flexible approach should be adopted in less constrained settlements.

Selby District is heavily constrained by both Green Belt and flood zone 3. As such, development limits for more sustainable settlements in the categories identified above which are not constrained should allow for flexibility to ensure that the development requirements of the District can be delivered over the Plan Period. Policy SP5 of the adopted Core Strategy sets a *minimum* annual housing target, in accordance with the NPPF's aspiration to '*boost significantly the supply of housing*' (Paragraph 49). The recommended approach to constraining the growth of settlements by implementing tight development limits does not allow for appropriate flexibility for the non-implementation of proposed allocations or extant planning permissions, or for additional development to be delivered over and above the minimum housing target, in accordance with the NPPF or Core Strategy Policy SP5.

It is acknowledged at Section 3.2.2 of the Draft Method Statement that more flexible development limits would allow for more sympathetic development around the edge of existing settlements. However we dispute that more flexible settlement boundaries would undermine or pre-empt the site allocation process and would therefore not be sound or justified. The approach to both setting development limits and allocations will be established simultaneously through PLAN Selby. Development limits will not be adopted prior to site allocations and therefore it is not considered that a more flexible approach to setting development limits in sustainable and unconstrained locations will prejudice the site allocation process. Rather, given the District's constraints and the sentiments of adopted Policy SP5, it is considered that adopting a more flexible approach to establishing development limits represents a sounder and more justified approach, and will also ensure that the Plan is positively prepared, in accordance with Paragraph 182 of the NPPF.

Whilst it is acknowledged that the setting of development limits is important and would be in accordance with the adopted Core Strategy, it is considered that a more flexible approach should be

adopted in sustainable and unconstrained locations, in accordance with the NPPF and adopted Policy SP5.

We trust that you will take our comments into consideration and develop the methodology for establishing development limits to include a flexible approach for unconstrained and sustainable settlements accordingly. Should you have any queries on the above, please do not hesitate to contact me. Otherwise, we look forward to notification of future consultation events in relation to the preparation of PLAN Selby.

Yours faithfully,

GEMMA FIELD

Senior Planner

Enc.

cc Emma Kateley – Church Commissioners



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10th August 2015

Dear Sir/Madam

'PLAN Selby' – DRAFT METHOD STATEMENT FOR SITE ALLOCATIONS: A FRAMEWORK FOR SITE SELECTION
RESPONSE ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND

We are instructed by our Client, the Church Commissioners for England (the Commissioners), to submit a response to the Draft Method Statement for Site Allocations: A Framework for Site Selection, to inform the emerging PLAN Selby.

The study has been reviewed and responses are provided below to Question 9 parts a) and b), as detailed on the District Council's website.

Our representations should be read in the context of the land that the Commissioners are promoting for residential development, which lies immediately contiguous to the built up areas of Selby and Brayton in the adopted Core Strategy.

Q9: Do you have any comments on:

a. The overall approach to the site selection process set out in section 6.3 of the study?

Section 6.3 of the Draft Method Statement outlines a four stage process for site selection as follows:

1. Initial Sift;
2. Quantitative assessment focusing on flood risk, accessibility and brownfield and low grade agricultural land;
3. Qualitative assessment focusing on environmental, social and economic criteria; and
4. Deliverability, focusing on the availability of land, its viability and impact on traffic, as well as when during the Plan Period the site could be developed.

This staged approach to the site selection process is generally supported, however some concerns are raised in relation to the specific criteria considered as part of some of the stages.



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In respect of Stage 1, it is considered that all sites falling within flood zone 3 should be discounted at this stage, as opposed to just those falling within zone 3b.

Table 2 at Paragraph 66 of Planning Policy Guidance (PPG) identifies residential dwellings as being 'more vulnerable' in terms of flood risk. Table 3 at Paragraph 67 goes on to identify that, notwithstanding the need for a sequential test, more vulnerable uses are considered acceptable in principle within flood zones 1 and 2. More vulnerable uses will only be considered acceptable in flood zone 3a following both a sequential and an exception test, setting out a clear distinction between the acceptability of residential development in flood zone 2 or flood zone 3a. On this basis, it is considered that all sites located within flood zone 3 should be discounted at this initial sift stage of the site selection process.

It is noted under Stage 2 that Selby District Council are proposing an approach to flood risk where a sequential test would be undertaken on a settlement by settlement basis (in accordance with the settlement hierarchy established at Policy SP4 of the adopted Core Strategy). This approach is supported, subject to the removal of sites in flood zone 3 from the site selection process at Stage 1, as detailed above.

In addition, it is proposed at Stage 2 to measure the accessibility of each Site in terms of proximity to services and public transport hubs. It is proposed to measure the distance from the centre of sites, however, in respect of larger sites, it is proposed to include a narrative to allow for the consideration of part of the site having better accessibility. This approach for the consideration of larger sites is supported, however, it is unclear how it will be applied. For example, will Arup or the District Council liaise with the relevant landowners or agents to clarify this?

In reference to the Church Commissioners' land which is a large Site contiguous to the built up areas of Selby and Brayton, submissions are made to the District Council on the basis that the north western part of the Site would be particularly appropriate for residential development. The part of the Site proposed for development will be significantly closer to the services and public transport hubs within Selby than the centre of the wider site.

In terms of Stage 3, it is generally agreed that the criteria proposed are appropriate to inform this stage of the site selection process. However, further detailed comments on how the criteria will be assessed (as detailed at Appendix A of the Study) is provided under Part b) below.

b. The details of the site assessment work proposed in Appendix A of the study?

In terms of how flood risk is proposed to be considered, as detailed at Appendix A, there appears to be an error as sites within flood zone 3a are considered to be 'neutral' (0), sites located within flood zone 2 are assessed as 'negative' (-) and sites in flood zone 1 are assessed as significantly negative (--). Given the guidance contained within Paragraphs 66 and 67 of the PPG, it is considered that this should be revised, with flood zone 3a being removed after it is discounted at Stage 1. Flood zone 1 should be revised as positive (+) and flood zone 2 should be revised neutral (0), subject to the sequential test. Should the District Council be minded to retain flood zone 3a sites through to Stage 3, it is considered that these should be assessed as negative (-).

It is noted that the assessments for physical / infrastructure constraints / permanent features or legal constraints should be amended. It appears that there is a further error in that 'major constraints which are difficult to remedy / overcome and which affect a large part of the Site' should be amended from negative (-) to significantly negative (--). Conversely, 'constraints exist but potential for mitigation and/or constraints affect some of the site' should be amended from significantly negative (--) to negative (-), on the basis that there is less potential for impact than the former.

In terms of the consideration of heritage assets, it is considered that the wording of the negative (-) criteria should be re-worded to make allowance for development which is within or close to a

conservation area or listed building, but where there is no harm or mitigation measures can be incorporated so that the resultant affect is 'less than substantial', in accordance with Paragraph 134 of the NPPF. It is also considered that the wording of the significantly negative (--) criteria should be amended to reflect development that results in 'substantial harm or total loss' of a heritage asset, in accordance with Paragraph 133 of the NPPF.

With regards to the Strategic Countryside Gap (SCG), it is noted that development sites which would reduce the gap between settlements within a SCG, but where the level of development is acceptable, is considered to be negative (-). It is considered that this should be revised to neutral (0) on the basis that development is likely to be small in scale and is considered as acceptable.

No assessment is identified for sites within the SCG, where development could be successfully accommodated into the landscape without impacting on the functions of the SCG (as identified in the Draft Strategic Countryside Gap Study). This should include where development would not reduce the gap between settlements. It is considered that such sites should also be assessed as neutral (0), on the basis that the functions of the SCG would not be impacted upon.

It is also considered that advice should be sought from a landscape expert in the first instance to determine whether the development of a site is acceptable, rather than to only seek advice on sites which are considered to have a negative affect based on the suggested criteria.

In terms of considering physical points of access, it is considered that there is no difference between the effects of a physical access point already existing, or whether one can be created within the landholding. As such, it is considered that both of these criteria should be assessed as positive (+).

In relation to provision of open space, it is considered that an additional significantly positive (++) criteria should be included where a site will provide public open space to meet a specific need identified by the local community or by the Evidence Base on public open space needs / deficiencies on the basis that the proposal is responding to identified need. It is also considered that the assessment of a particular site against these criteria should be informed by the Evidence Base on public open space needs and local information provided by Parish Council or communities, rather than being based on Officer Judgement as proposed.

It should also be noted that there appears to be an error under the positive (+) criteria for air quality, which states that a site would lie within an area where air quality is currently 'unacceptable'. It is considered that this should be amended to an area where air quality is 'acceptable'.

No information is provided on how sites will be assessed overall under Stage 3. It is suggested that the criteria detailed in Appendix A are weighted, attaching greater importance to those criteria which cannot be mitigated against through the development process (i.e. access to employment and key services), and lesser weight to those criteria where mitigation could be provided as part of any future development proposal (i.e. biodiversity – aside from national and international designations, and air quality). Applying a weighting to the criteria at Stage 3 will assist in ensuring a robust approach to the site selection process is undertaken to ensure the sustainability of future development.

We trust that you will take our comments into consideration and continue to develop the methodology for the selection of site allocations accordingly, to ensure that the most robust and sustainable approach is adopted. Should you have any queries on the above, please do not hesitate to contact me. Otherwise, we look forward to notification of future consultation events in relation to the preparation of PLAN Selby.

Yours faithfully,

GEMMA FIELD
Senior Planner

Enc.

cc Emma Kateley – Church Commissioners



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BY EMAIL AND POST (ldf@selby.gov.uk)

19099/A3/GF/ac

10th August 2015

Dear Sir/Madam

**'PLAN Selby' – DRAFT GROWTH OPTIONS FOR DESIGNATED SERVICE VILLAGES
RESPONSE ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND**

We are instructed by our Client, the Church Commissioners for England (the Commissioners), to submit a response to the Draft Growth Options for Designated Service Villages (DSVs) to inform the emerging PLAN Selby.

The three Options for growth presented in the draft consultation document have been reviewed and responses are provided below to Questions 10 and 11, as detailed on the District Council's website.

Our representations should be read in the context of the land that the Commissioners are promoting for residential development, which lies immediately contiguous to the built up areas of Selby and Brayton in the adopted Core Strategy.

Q10: Appendix B of the study provides a Settlement Profile for each Designated Service Village, including environmental and heritage designations. Is there any information that is incorrect or missing from these Settlement Profiles summaries?

It should be noted that whilst the Appendix B Settlement Profile in relation to Brayton identifies the presence of a Community Centre within the village, the sustainability rankings in relation to service provision at Table 6.1 and Table 7.7 overlook this and score Brayton 0 for church / village hall provision. Given the presence of a Community Centre within the village, which offers a wide range of functions, the sustainability assessments under Option 2 should be revised to reflect this. As a result of this revision, Brayton will be identified as the most sustainable DSV at Table 7.7.

Q11: If you had the choice, let us know which option for growth of the Designated Service Villages you would choose?

Of the three growth options for DSVs outlined within the draft consultation document, it is considered that a combination between the approaches taken under for Option 2, which promotes



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the growth of DSVs based on accessibility and service provision, and Option 3, which promotes the growth of DSVs without the need for Green Belt release, would be the most appropriate strategy.

It is considered that Option 1, which simply splits the distribution of growth across all DSVs according to their existing size is not appropriate, as it does not take account of settlement sustainability or Green Belt constraints.

Paragraph 83 of the National Planning Policy Framework (NPPF) confirms that Green Belt boundaries should only be altered in 'exceptional circumstances'. Given that the draft consultation document offers a solution for growth within DSVs which does not necessitate the need for Green Belt release, it is not considered that exceptional circumstances exist to warrant any release from the Green Belt within Green Belt constrained DSVs. It is considered that this should be the starting point for considering the distribution of growth across the identified DSVs.

However, under Option 3, which takes account of the Green Belt constraints, a blanket percentage increase on existing settlement sizes has been proposed across all non-Green Belt constrained DSVs. This does not take account of the sustainability or accessibility of each individual settlement. In order to ensure the most robust approach, the sustainability of each non-Green Belt constrained DSV should be considered to inform the level of growth that each non-Green Belt constrained DSV is capable of accommodating.

The adopted Selby District Core Strategy (October 2013) identifies that villages closely associated with the District's market towns have developed into large, sustainable settlements. Brayton, Barlby and Thorpe Willoughby are identified as the three largest sustainable villages given their close links to Selby. South Milford is also identified given its proximity to Sherburn in Elmet. Paragraph 4.1 of the Core Strategy goes on to confirm that the three villages in close proximity to Selby are interdependent to, and fulfil a complementary role to Selby. It goes on to identify that these three villages are more sustainable than the other DSVs, given their size, range of facilities and the close links with Selby and its associated services and employment opportunities.

The adopted Core Strategy clearly identifies these three settlements as being the most sustainable DSVs within the District. This is largely supported through the sustainability review of each DSV undertaken to inform Option 2, where Brayton and Thorpe Willoughby score the highest in terms of overall sustainability. However, as noted above under Question 10, the Community Centre within Brayton has been overlooked as part of the assessment and taking account of this at Table 7.7, Brayton alone should be the highest scoring DSV in terms of sustainability.

It is considered that a combination of the approaches outlined under Options 2 and 3 should be adopted to inform the level of growth for the DSVs. Given that an alternative approach has been proposed, exceptional circumstances do not exist to warrant Green Belt release at the Green Belt constrained DSVs and as such, Green Belt constrained DSVs should be discounted from the process.

It is considered that the percentage of growth to be accommodated within the non-Green Belt constrained DSVs should be weighted to take account of their relative sustainability. This will ensure that growth is directed to the most sustainable DSVs, i.e. Brayton and Thorpe Willoughby, allowing them to continue to perform their supporting role to the Principal Settlement of Selby. A smaller proportion of growth may then be delivered in less sustainable non-Green Belt constrained DSVs in order to ensure continued support of their respective facilities. It is considered that this approach of basing growth on the relative sustainability of the non-Green Belt constrained DSVs rather than their size alone, is more consistent with the principles of supporting sustainable development outlined in the NPPF.

We trust that you will take our comments into consideration and make the necessary revisions to the approach to distributing growth across the DSVs to reflect the most sustainable approach, in accordance with National Planning Policy. Should you have any questions or would like to discuss our suggested approach in further detail, please do not hesitate to contact me. Otherwise, we look forward to notification of future consultation events in relation to the preparation of PLAN Selby.

Yours faithfully,

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10th August 2015

Dear Sir/Madam

**'PLAN Selby' – MARKET TOWNS STUDY DRAFT PART A: BASELINE EVIDENCE REVIEW
RESPONSE ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND**

We are instructed by our Client, the Church Commissioners for England (the Commissioners), to submit a response to the Market Towns Study Draft Part A: Baseline Evidence Review, to inform the emerging PLAN Selby.

The three Options for growth presented in the draft consultation document have been reviewed and responses are provided below to Question 17 parts a), b) and c), as detailed on the District Council's website.

Our representations should be read in the context of the land that the Commissioners are promoting for residential development, which lies immediately contiguous to the built up areas of Selby and Brayton in the adopted Core Strategy. As such, our response focuses on the Market Town of Selby only.

It should be noted that Barton Willmore attended engagement workshops on behalf of the Commissioners in respect of Selby in June and July 2015. These representations build on our comments provided at these workshops.

Q17: Looking at the factsheets for Selby which talk about the growth and regeneration of the town do you have any comments on

a. the 'deficits, needs and aspirations'?

It is agreed that there is a need to identify sufficient housing land within PLAN Selby to deliver the 7,200 dwellings identified within Policy SP5 of the adopted Core Strategy. It is also agreed that 51% of these dwellings should be delivered in Selby, given that it is identified in Core Strategy Policy SP4 as the most sustainable settlement within the District. It should also be noted that there is potentially a need for Selby to accommodate some, if not all of Tadcaster's housing requirement in addition to



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this. However, it should be noted that the District's housing target is based on a *minimum* requirement of 450 dwellings per annum over the Plan Period. As such, it is entirely reasonable for the District Council to aspire to exceed this minimum housing target by identifying additional allocations for housing growth within PLAN Selby. Such an aspirational approach would be supported by the Church Commissioners.

b. the technical issues?

It is acknowledged in the Factsheet for Selby that the town is heavily constrained by flood zones 2 and 3, with little or no available land within the town falling within flood zone 1 and this has influenced where development has been delivered to date. However, it is also acknowledged in the Factsheet that further consideration may need to be afforded through PLAN Selby to potential sites which were previously discounted through the Strategic Flood Risk Assessment. Given the constraints to the growth of Selby, we support this approach to reviewing sites previously discounted on the basis of flood risk. Although it is considered that in the first instance, discounted sites located within flood zone 2 only should be considered as potential locations for development. This would be consistent with the adopted Core Strategy that, notwithstanding the flood risk constraints around Selby, confirms that it should remain the focus for the majority of housing growth within the District, whilst maintaining a sequential approach to directing housing growth to areas with the lowest risk of flooding in relative terms (i.e. flood zone 2 before flood zone 3).

Barton Willmore have also submitted representations to the Draft Strategic Countryside Gap Study during this consultation period, on behalf of the Commissioners. Importantly, the Factsheet for Selby states that this Study will inform, but not pre-determine decisions to be made later in the process on whether Strategic Countryside Gaps (SCGs) should be designated and will assist in informing the appropriateness of any allocations for development. Our response to the Market Towns Study should be read in conjunction with our representations to the Draft Strategic Countryside Gap Study.

It is important to recognise that SCGs are only one of a number of constraints to development around Selby which needed to be robustly reviewed by the Council to ensure that the most sustainable options for growth are selected. It is considered that there is scope to review SCGs to identify opportunities to accommodate growth without compromising their function. In particular, it is considered that the north western part of the Selby/Brayton SCG could be reviewed to sensitively accommodate development to meet the housing needs of Selby without reducing the separation distance between the two settlements, or otherwise resulting in harm to the functions of the SCG.

Barton Willmore have also submitted representations to the Draft Method Statement for Identifying Development Limits during this consultation period, on behalf of the Commissioners. It is noted that the Draft Method Statement recommends establishing tight development limits around settlements and a methodology for assessing development limits has been developed accordingly. However, as detailed in both the Selby Factsheet and the Draft Method Statement, the location of development limits will need to be informed by a number of the other emerging Evidence Base Documents for PLAN Selby. As such, it is considered that this recommendation and the proposed methodology pre-determine the outcome of these other studies. It is considered more appropriate to establish wider development limits in the most sustainable settlements such as Selby, to ensure that the full development requirements of the Core Strategy can be met, allowing for some flexibility. This approach will also be fully in accordance with Part c) of Core Strategy Policy SP5, which allows for small scale sites within and / or adjacent to the boundary of the Contiguous Urban Area of Selby to be identified through PLAN Selby. Our response to the Market Towns Study should be read in conjunction with our representations to the Draft Method Statement for Identifying Development Limits.

c. The options and key planning issues?

Regarding the spatial options identified for housing, the approach to allocating more sites than required to ensure the delivery of the *minimum* housing requirement identified within the Core Strategy



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is supported. This additional flexibility will also ensure that an allowance is made for non-delivery and that any technical constraints such as flood risk do not compromise the delivery of the Core Strategy requirements. Such an approach would be in full accordance with Paragraph 47 of the National Planning Policy Framework (NPPF) which seeks to '*boost significantly the supply of housing*'.

In terms of the sustainability and accessibility of potential areas for growth, it is considered that growth to the south of Selby would be an unsustainable option, given the distance from the town centre. Any growth to the northwest of Selby would need to be identified longer term, given the major infrastructure improvements required in this area, including a bypass.

It is considered that land within the Church Commissioners' ownership, contiguous to the south western built up area of Selby, is one of the most sustainable and accessible locations for growth, being contiguous to the built up area of Selby and within close proximity of Selby's services and facilities. Whilst it is identified as falling within the SCG between Selby and Brayton, as detailed above, our representations to the Draft Strategic Countryside Gap Study confirm that the north western part of the Church Commissioners' land could be developed without compromising the identified functions of the SCG. It is also important that the SCG designation is not considered in isolation, but as one of a number of constraints to the growth of Selby and the loss of a small part of the SCG (without impacting upon its functions) should be weighed against other factors such as sustainability and the need to direct development away from areas with the greatest risk of flooding.

It will be important for the update to the 2010 Strategic Flood Risk Assessment to inform the most appropriate areas for the growth of Selby to ensure that areas at lower risk will be delivered in the first instance.

We trust that you will take our comments into consideration when considering options for the growth of Selby. Should you have any questions or would like to discuss our suggested approach in further detail, please do not hesitate to contact me. Otherwise, we look forward to notification of future consultation events in relation to the preparation of PLAN Selby.

Yours faithfully,

GEMMA FIELD
Senior Planner

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