



**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](http://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	Agent Details (if applicable)
Name	<input type="text"/>	Claire Linley - DPP Planning
Address	<input type="text"/>	Fifth Floor No 2 Wellington Place Leeds
Postcode	<input type="text"/>	LS1 4AP
Telephone no.	<input type="text"/>	<input type="text"/>
Email address	<input type="text"/>	claire.linley@dppukltd.com

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

Question no.  Paragraph

See attached letter

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

Topic / Chapter

Question no.  Paragraph

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

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Topic / Chapter

Question no.

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Paragraph

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

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

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

### 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.

Signed

Claire Linley

Dated

19th January 2015

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

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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**



DPP Planning  
 Fifth Floor  
 No 2 Wellington Place  
 Leeds, LS1 4AP  
 t +44 (0)113 366 2007  
 info@dppukltd.com  
 www.dppukltd.com



L001ml

19th January 2015

Selby District Council  
 Forward Planning  
 Civic Centre  
 Doncaster Road  
 Selby  
 YO8 4JS

Dear Sir/Madam,

**COMMENTS ON THE "PLAN SELBY" CONSULTATION DOCUMENT BY DPP ON BEHALF OF THE OWNERS OF LAND AT THORPE WILLOUGHBY**

**Introduction**

We write on behalf of the owners of land at Thorpe Willoughby in order to comment on the draft "PLAN Selby" document.

Our clients control land to the north of Leeds Road, Thorpe Willoughby and their land agent is in discussions with adjoining land owners. The extent of the representation site is shown edged blue on the attached plan. The land which is in the control of our clients is shown edged in red.

The land is bounded to the north by the main railway line, to the south by Leeds Road beyond which is the recently consented Linden Homes development, to the east by the existing built up area of Thorpe Willoughby and to the west the site is bounded by hedgerows and field boundaries. The site is in agricultural use.

The eastern part of the site is identified on the Environment Agency's Flood Maps as lying within Flood Zone 2. It is envisaged that this area would be given over as open space to provide for the open space needs of the existing and proposed population which will lie to the north of Leeds Road. It is not envisaged that development would occur on the Flood Zone 2 land.

**PLAN Selby**

We agree with the statement made at Paragraph 1.6 that PLAN Selby must consider the ways in which the Authority can deliver what is set out in the Core Strategy. We also agree with Paragraph 1.7 in that PLAN Selby will need to identify sufficient sites to accommodate the development needs identified in the growth vision as set out in the Core Strategy. These statements are welcomed.

We also agree that there should be more detailed 'Vision' statements for each of the three settlements of Selby,

Sherburn in Elmet and Tadcaster and that the vision statement should reflect the strategy set out in the Core Strategy Framework (see paragraph 1.8)

We will now turn to answer questions 5, 7, 8, 9 10, 23, and 57 as set out in the PLAN Selby document.

- Q5** a) Are these the right objectives?  
b) Are there any others which should be included?

In the preceding paragraphs to this question PLAN Selby sets out the Vision of the Core Strategy's which is to achieve a distinctive rural district with an outstanding environment, a diverse economy and attractive, vibrant towns and villages in which 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 by 2027.

The suggested Aims and Objectives for PLAN Selby are therefore as follows:-

Aim

- To make Selby District a great place to do business, to enjoy life and make a difference in line with the Councils' emerging Corporate Plan
- To deliver the Core Strategy growth in a sustainable manner consistent with national policy and local evidence.

Objectives

1. To deliver new development sites (allocations) for housing and employment needs and other uses (for example town centre uses)
2. That site selection procedure will include consideration of sustainability objectives
3. To translate strategy into place-specific policies and proposals to promote growth and to protect assets
4. To set up to date Green Belt Boundaries to endure beyond the life of this plan, and designate Safeguarded Land
5. To set new area-based policies and boundaries (such as Development Limits and town centre boundaries) if found to be needed.
6. To provide detailed policies/designations on specific topics (such as Climate Change and Renewable Energy, Rural Affordable Housing Exceptions Sites and Travellers) where appropriate
7. To set criteria-based policies only where necessary in order to avoid an overly-detailed plan or too many policies with little relevance.

These aims and objectives seem comprehensive and appropriate.

- Q7** a) Do you agree with the proposed approach to the base data?  
b) Do you agree with the broad principles of the calculation method?

We agree that the most up to date base information should be used in calculating the housing requirement. PLAN Selby suggests using the data which will become available in March 2015 for the next version of the PLAN Selby document. There is little information on how this data is to be gathered and at this stage the information is unavailable to comment upon. We therefore reserve our right to comment on the March 2015 data when it becomes available.

The methodology used to calculate the residual housing requirement for each settlement tier appears robust and sound albeit the figure used in column A should be increased to allow for the non-delivery of sites (see our answer to question 8).

- Q8** a) Should PLAN Selby over-allocate to allow for any non-delivery on the allocations? By what method and by how much?  
b) How should PLAN Selby seek to allocate sites in such a way as to secure delivery over the whole plan period?  
c) Is there opportunity to have contingency sites in case others are not delivered elsewhere in the District? How might the contingency sites release be managed to maintain a 5 year housing land supply?

We agree with paragraph 3.17 that the housing requirement should be regarded as a minimum target and that the plan should deliver this target as a minimum. Given that not every allocation will be delivered and there is the potential that some sites will not deliver the quantum envisaged we would recommend that the plan should over allocate land to allow for non delivery. We would suggest that the over allocation should be between 10% and 15% of the overall housing requirement of 7200 dwellings giving an overprovision of between 720 to 1080 dwellings.

The consultation draft suggests that the Council have applied a 10% buffer for non-delivery but this can only relate to column C – outstanding planning permission. This is welcomed. However it does not take into account non-delivery from new allocations. To ensure that the minimum housing requirement is delivered, a robust level of land must be allocated and to provide this surety we would recommend that an over allocation equivalent of 10% to 15% of the overall housing requirement of 7200 dwellings is made.

We note that there are several large allocations and existing commitments which should generate completions over the life time of the plan. However if a site, such as Olympia Park which is a very complex site, does not come forward this could significantly affect the Council's ability to deliver and achieve the minimum housing requirement. Indeed we note that despite receiving a resolution to approve the development at Olympia Park in December 2013, the Section 106 agreement has still not been executed. This demonstrates the complexities associated with bringing forward very large sites. This supports our view for a robust buffer provision.

Our initial view is that the additional buffer provision should be distributed in accordance with the percentage distribution strategy set out in policy SP5 of the Core Strategy.

The Council should not allocate sites that they are not confident will come forward even if there is there is an expectation that an ownership constraint or physical problem might be overcome in the future. This expectation may not be realised. The Council should only allocate land that they are confident is available for development and can be viably developed.

To ensure delivery it is always best to have a large number of sites which are in the control of multiple parties rather than having all of the eggs (so to speak) in a few baskets. As referred to above, a limited number of larger sites may affect the Council's ability to deliver the minimum housing requirement.

The additional buffer could, in part, be made up of extensions to sites that have been put forward but only where there is a realistic opportunity of these extensions being delivered.

In addition to increasing the housing requirement to allow for the non-delivery of housing allocations we agree with PLAN Selby that it is a good idea to have a further contingency supply of sites throughout the district to be potentially brought forward if the minimum housing requirement is unlikely to be met for whatever reason. Whilst we are not keen on the word contingency it is plain that PLAN Selby intends this pot of sites to act as a supply of sites that would be protected from development until such time as they are needed. This is welcomed and indeed it is likely to be essential if Selby is to meet its minimum requirement towards the end of the plan period. For clarity if contingency sites are to be identified these sites should be protected by a new policy and that these sites should be in addition to those needed to meet the housing requirement including the discount applied to the non-delivery of existing commitments and the allowance for the non-delivery from future housing allocations.

We would suggest that between 10% and 15% of the overall housing requirement of 7200 dwellings (720 to 1080 dwellings) should be provided to ensure that there are the sufficient contingency sites available to ensure that the minimum housing requirement is capable of being met at all times during the plan period.

- Q9**
- a) Is a simple percentage growth across all Designated Service Villages a fair and appropriate starting point for deciding the split between the DSVs?**
  - b) Bearing in mind issues such as land availability, flood risk and other technical constraints (e.g. highways capacity and access) are there particular criteria that should be taken into account in assessing the final minimum target for Designated Service Villages?**



We welcome the recognition in paragraph 3.24 that the Core Strategy has already established that all of the Designated Service Villages (“DSV”) are capable of accommodating growth and that it is the roll of PLAN Selby to establish the minimum provision for each DSV.

We also note that PLAN Selby will allocate land in accordance with the provisions of the Core Strategy. In the context of the above, the first criterion quoted for the identification of appropriate sites is to “*direct development to sustainable locations in accordance with Policy SP2*”. We welcome this statement. The principle reason for this is that the sustainability of the 18 DSV’s varies considerably. For example Ulleskelf is a relative small and isolated settlement whereas Thorpe Willoughby is comparatively large settlement and importantly it lies close to Selby Town wherein there lies a multitude of services, facilities and places of employment. Consequently it is clear that certain DSV’s are more sustainable than others.

We also welcome the acknowledgement at paragraph 3.26 that 1330 dwellings are required in the DSV’s and that this is a minimum requirement.

We note the suggestion at paragraph 3.28 of PLAN Selby that each of the DSV’s should grow proportionately based on the existing number of households but as outlined above certain DSV’s are more sustainable than others. Therefore the larger and more sustainable settlements could and should accommodate a higher proportion of the identified level of growth than the smaller and less sustainable settlements. Even more inappropriate than the distribution strategy suggested at paragraph 3.28 is that contained in paragraph 3.29. This paragraph suggests that an equal distribution of the identified housing requirement should be made. This would mean that smaller and less sustainable settlements would receive proportionately more growth than the larger and the more sustainable settlements. Consequently it is our view that neither a simple percentage split based on the existing number of households nor an equal share basis is an appropriate methodology for the distribution of the housing requirement for the DSV’s.

It is plain that a sustainability matrix needs to be developed in order to properly distribute the housing requirement for the DSV’s. This matrix needs to weigh such factors as the size of the settlement, the level of existing services within them (i.e. primary schools, a proper level of recreational facilities, a place of worship and the availability of access to key facilities such as a foodstore/post office etc.), frequency of bus services and proximity to Selby and the other principal settlements of Tadcaster and Sherburn. If this exercise is done properly a greater proportion of the identified housing requirement for DSV’s will be directed to settlements such as Thorpe Willoughby and Balby (subject to land availability and environmental factors such as flood risk issues/green belt and landscape matters) than other settlements such as Ulleskelf.

In distributing the identified housing requirement for the DSV’s the Council also need to be mindful of the market perception of certain villages. For example Whitley and Eggborough are perceived to be less attractive market areas than Cawood, Appleton Roebuck and Thorpe Willoughby. There is little point in allocating a large proportion of the identified housing requirement to a settlement where house builders are not likely or are less likely to build.

The above factors are not intended to represent an exhaustive list of factors that need to be taken into account. Rather the factor referred to above should be seen as a sample of key considerations.

**Q10 The Core Strategy sets the ‘rules’ for choosing sites; but do you have any views on the relative importance or weight to be attached to the criteria for site selection? Should the Development Limits be drawn tightly to maintain the settlement pattern, or loosely around the settlements to enable sympathetic development?**

The Council recognise at Paragraph 3.26 that there is a need to produce a thorough site selection methodology. We welcome this. Good examples, in our view, of a site selection methodology are those produced by the East Riding and the City of York Council. Whatever the respective weighting given to an identified factor it is nevertheless plain that the weighting must be transparent and result in a sustainable pattern of development; bearing in mind that sustainable development is the golden thread running through both plan making and decision taking. We will not comment at this stage on any weighting proposals but we would suggest that greater negative weight needs to be attached to such matters as flood risk (e.g. within each settlement tier land should first be identified in flood zone

1, then flood zone 2 and only if land is not available in any of the above categories should land in flood zone 3 be considered. Considerable negative weight should also be attributed to sites which adversely affect national environmental resources and wildlife considerations and this negative weight should increase or decrease with the relative importance or otherwise of the site. Positive weight can be given to the potential to improve environmental resources such as the enhancement of the biodiversity of a site or area. The impact on the landscape should be considered separately to environmental issues and clearly the greater the landscape sensitivity the less likely the site will be able to accommodate development. The lack of any material impact on the landscape is an important factor which at least could be considered to have a neutral impact. Considerable negative weight should also be attached to other material planning matters such as proposals to develop in strategic gaps (see our response to question 23). Access and accessibility considerations are also plainly an important factor.

We would welcome the opportunity to comment on the site selection methodology when it has been produced.

- Q23** a) Where should the boundaries of the new Strategic Countryside Gap between Selby and Thorpe Willoughby be drawn?  
b) Are the boundaries of the other existing Strategic Countryside Gaps still appropriate?

The concept of a strategic gap between key settlements is an important and long established planning policy which maintains the identity of distinct and separate communities. There is no more important gap than that between Selby and Brayton. The same comment applies to the other strategic gaps such as Selby and Balby. These gaps should be retained in their entirety. PLAN Selby seeks views on the appropriateness of defining a strategic gap between Selby and Thorpe Willoughby. We would generally support this proposal. If development in this area is unavoidable, and evidence should be produced to demonstrate that there is no other more suitable or appropriate site or sites, then it may be possible to identify certain limited areas where the gap can be narrowed without harming the fundamental objectives of this policy. However as an overarching rule, the strategic gaps should be retained.

- Q57** a) How should Thorpe Willoughby grow and develop?  
b) What else is needed in Thorpe Willoughby that could be allocated a site?

Given the need to retain separation between Selby and Thorpe Willoughby, as identified in PLAN Selby, Thorpe Willoughby should not grow to the east. It is not logical for development to cross the boundary which is formed by the Selby By pass and therefore there is limited opportunity for growth to the south. This limits the opportunities for growth to the north and west. To the north growth should not occur beyond the railway line. Thorpe Willoughby is effectively divided by Leeds Road and to ensure that the community that lives on the northern side of Leeds Road benefits from additional services and facilities it is our view that growth in Thorpe Willoughby should be directed to the land to the north of Leeds Road as shown on the plan attached with this representation. There is limited or no recreational facilities in the north proportion of Thorpe Willoughby. The allocation of the representation site provides an ideal opportunity to secure the provision of some recreational facilities on the northern side of the settlement and this would benefit existing as well as future residents.

Thorpe Willoughby is a large settlement which is located on the A63 and lies close to Selby Town. It is therefore one of the most sustainable villages in the district and should accommodate more growth than some of the other DSV's. There are a number of sites within Thorpe Willoughby and it is clear that Thorpe Willoughby is capable of accommodating growth. It is our view that the representation site is an appropriate location to provide for the growth of Thorpe Willoughby.

We hope that the comments will be taken into account and that they prove useful in formulating the next version of PLAN Selby.

Yours faithfully,

Mark Lane

Director

DPP

[Mark.Lane@dppukltd.com](mailto:Mark.Lane@dppukltd.com)

Tel: 0113 2095625

Mob: 07500 330091



