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1528/L0010ml

Selby District Council
Civic Centre
Doncaster Road
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10th August 2015

Dear Sir,

LET'S TALK PLAN SELBY

Introduction

We attended the PLAN Selby Let's Talk workshops held on the 30th June and the 14th July and we found them to be interesting and informative and I hope that the comments we made at these events have been useful to the planning process.

In addition to our input into the workshops we would also like to comment on a number of draft studies published by Selby Council in particular:-

- PLAN Selby Site Allocations: A Framework for Site Selection;
- A Study of Green Belt, Strategic Gaps, Safeguarded Land and Development Limits for PLAN Selby: Method Statement for Definition of Development Limits;
- A Study of Green Belt, Strategic Gaps, Safeguarded Land and Development Limits for PLAN Selby: Strategic Countryside Gaps; and

- Other matters

Comments

We will comment on each of the above documents below:-

PLAN Selby Site Allocations: A Framework for Site Selection

In general we welcome this well written and clear document.

In relation to Section 5.0 we have found the methodology utilised by the East Riding of Yorkshire Council (ERYC) to be clear and transparent. It was easy to identify and understand the process and to interrogate the scoring methodology and therefore address real and perceived issues relating to any site.

Section 6.0 deals with the 4 stages of the site selection methodology.

In relation to stage 1 we welcome the desire to set a clear site selection methodology. We support in general the methodology which is to be used to screen or sieve sites out which is as follows:-

- Consistency with settlement hierarchy
- Relationship to the built form
- Flood Risk
- International and National Environmental Designations
- Ancient Woodland
- Health Safety Executive Zones
- Heritage Designation
- Environmental Designations

In relation to heritage designations we agree that sites which include Scheduled Monuments and Parks and Gardens with Historic Interest should be screened out. We also agree that Listed Buildings and the setting of Listed Buildings should not be used as a screening criteria as these matters are capable of being resolved or mitigated. This is a matter for stage 3 or stage 4.

We would suggest a further criteria for stage 1. We believe that the Strategic Gaps are an important planning consideration as this policy safeguards the identity of individual settlements. The value of this planning objective is succinctly expressed in relation to Green Belt policy. The Green Belt proposes and objectives equally apply to non-Green Belt areas such as around Selby Town where there is a clear need to retain the identity of the adjoining settlements. We therefore strongly feel that development in the existing and any

new strategic gaps is inappropriate and as such proposals which would erode any of the existing or proposed strategic gaps should be sieved out at stage 1.

In relation to stage 2 we welcome the report's recommendation to utilise the methodology employed by the ERYC.

We are unsure how the LPA will interpret or score the physical / infrastructure constraints/permanent features or legal constraints category. Almost all of the other categories are definitive e.g. the site lies within so many metres of a facility. There is also no definition as to what this category covers or includes. In essence this category needs a considerable amount of judgement and it is our view and the types of matters raised are, (in the main) covered in stage 3, i.e. is access obtainable. This category should therefore be deleted as it is included in stage 3. If all of the matters that this category is intend to encapsulate are not included in stage 3 we can see no reason why they cannot be included there.

In relation to the issue of legal constraints surely this should be covered in stage 4. If there is a legal constraint the site will not be deliverable.

In relation to stage 3 we recall that the ERYC weighted their criteria in that some criteria could have 3 positive marks and 3 negative marks whilst others criteria only 1 or 2 positive marks or sometimes not even that (just a neutral score). We feel that this gives a degree of proportionality to the scoring process as clearly not all factors are as important or detrimental as others.

We also feel that the "infrastructure capacity" criterion should be divided out into its component parts to allow for easy analysis e.g. utilities, school, highway etc.

We cannot identify a table which sets out what score needs to be obtained for a site to move onto stage 3.

In relation to stage 4 we note that one of the criterion is "assessment of traffic impacts". We feel that this should be part of stage 3.

A Study of Green Belt, Strategic Gaps, Safeguarded Land and Development Limits for PLAN Selby: Method Statement for Definition of Development Limits

We welcome the acknowledgement at paragraph 2.3 that there is a commitment to review the development limits based upon the settlement hierarchy and the types and scale of growth should be appropriate to each settlement as defined by the Core Strategy.

To establish the most appropriate approach to define the development limits of the selected settlements the Council have reviewed the considerations that other authorities have used. We also welcome this approach.

Section 3.3, 3.4 and 3.5 of the study are confusing and could be written more clearly. If we are reading this correctly the proposed development limits will be informed by the Green Belt review and Strategic Countryside Gap analysis, which will in turn inform the Housing and Employment Site Selection Process and sites will be selected. Under part 1 of the table in section 3.4 the study suggests that the development limits will be amended to reflect the proposed allocations made as a result of the above assessment. This seems sensible. It does not list or say how the site boundaries will be defined. Do we assume that if allocated for development the allocations have been assessed against part 2 and are found to be acceptable or is the redefinition of the development limits carried out as part of the site allocation process/exercise. Part 2 is entitled "checking existing development limits" and appears to relate to simply that i.e. it does not apply to proposed allocations. This seems reasonable as sites will only be capable of being allocated if they are, for example, well related to the urban area.

However in section 3.5 the document then refers to an assessment of the Development Limits in the context of the site allocations. If it is the intention of the study to assess the allocations in the context of the criteria set out in part 2 of the table then the study should state this clearly. However the criteria relate to matters that deal with anomalies in the existing development limits and not criteria for establishing boundaries for new allocations.

A Study of Green Belt, Strategic Gaps, Safeguarded Land and Development Limits for PLAN Selby: Strategic Countryside Gaps

We note that the study indicates that the adopted Core Strategy confirms that there are 4 Strategic Countryside Gaps around Selby. There are 3 existing Strategic Countryside Gaps around Selby and 1 proposed Strategic Countryside Gap. In addition paragraph 4.40 of the Core Strategy states *"It is also important to maintain the character of individual settlements outside the Green Belt by safeguarding 'strategic countryside gaps' between settlements, particularly where they are at risk of coalescence or subject to strong development pressures as is the case with Selby and the surrounding villages"*.

We note that paragraph 5.30 of the Core Strategy also confirms that the boundaries of the Strategic Countryside Gaps may be reviewed but states that *"because of the limited size of the Strategic Countryside Gaps and their sensitive nature any scope for amendment is likely to be limited"*. We agree with this statement. In effect there is little or no scope to amend the existing Strategic Countryside Gaps other than to correct anomalies.

We would go so far as stating that as the Core Strategy requires the provision of 4 Strategic Countryside Gaps around Selby Town then these 4 Strategic Countryside Gaps must be provided. To do otherwise would mean that PLAN Selby would not be in conformity with the Core Strategy.

We welcome the acknowledgement at paragraph 3.2 that the key purposes of the Strategic Countryside Gaps are to:-

- To protect the individual identity of settlements;
- To prevent coalescence of settlements; and
- To preserve the existing settlement pattern by safeguarding the openness of intervening landscape.

We wholly support and endorse these purposes.

We note and welcome confirmation that the study considers that the following areas fulfil roles of being Strategic Countryside Gaps and that no changes to the boundaries are proposed:-

- Selby and Brayton;
- Barlby Bridge and Barlby;
- Barlby and Osgodby;
- Church Fenton East and West;
- Cliffe/Hemingbrough;
- Gateforth;
- Hensall North and South;
- Skipwith;
- Stillingfleet; and
- Thorganby.

We also note and welcome confirmation that the study considers that the proposed Strategic Countryside Gap to the east of Thorpe Willoughby is justified and that the boundaries to the Strategic Countryside Gap should be defined. We agree with the definition of a Strategic Countryside Gap between Selby and Thorpe Willoughby.

Other Matters

We understand that the local community of Selby Town believe that there are two options for the long term development of Selby Town (post the current plan period) include the expansion of Selby Town to the north west, which we support, and development to the south of the bypass. We do not support this latter option for a number of reasons and these are as follows:-

- The bypass forms a logical physical and visual limit to the extent of development;

- The bypass forms a physical break separating Selby from the countryside. Development beyond the bypass would not integrate into the urban area of Selby Town;
- Development here would be a considerable distance away from the amenities within Selby Town and would not be as sustainable as development in other locations for example to the north west of Selby Town;
- Given the distance from the town centre development here would require a whole host of new services and facilities which, like Staynor Hall, would take time to deliver. In the meantime there would be increased pressure on the services and facilities in Selby, particularly schools; and
- Once development is allowed to breach the bypass this will be the direction of growth for the foreseeable future. If this is allowed to happen it will preclude the ability of the LPA to plan for growth in other areas and in particular to provide additional connectivity to the north of the settlement.

Conclusion

We look forward to the next stage of the PLAN Selby process and we hope that our input to date has been of assistance.

Yours faithfully,

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Director

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