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To whom to may concern

Dear Sir / Madam,

PLAN Selby Sites and Policies – Initial Consultation

Thank you for the invitation to consult on PLAN Selby Sites and Policies Local Plan. The Highways Agency (Agency) has reviewed the documents and would wish to comment on issues that are relevant to the interests of the Agency.

The Agency's key concern is to protect the primary role of the Strategic Road Network (SRN) and to ensure its safe and efficient operation. In the Selby district, this relates to the A1(M), M62 and A64. The Agency would therefore have concerns over any development proposals or plans which could have a material impact on these strategic roads.

Circular 02/2013, The Strategic Road Network and the Delivery of Sustainable Development, sets out the Agency's role in the planning process. Please note that in considering Local Plan proposals, the Agency is required to assess the cumulative and individual impacts of Local Plan proposals on the ability of the various road links and junctions to accommodate the forecast traffic flows in terms of capacity and safety.

The Agency has structured its response to this consultation in accordance with relevant questions posed through the PLAN Selby Sites and Policies document. Please note that this letter is the Agency's formal response - the online comment form has not been completed.

It is understood that, at this stage, PLAN Selby does not propose or allocate specific sites for development, but rather the policy for determining how sites should be allocated. Consultation on specific sites will occur during later stages of the plan making process. The Agency wishes to be consulted as the site allocations are progressed in PLAN Selby.

Q1 Please refer to the Sustainability Appraisal report

http://www.selby.gov.uk/upload/FINAL_SEA_SA.pdf.

Please let us have your comments on the objectives and approach.

This questions whether PLAN Selby should include further policies for any of the following: travel plans, parking standards, active traffic management, integrated demand management, capacity improvements, electric vehicle charging points, cycle routes and parking. The Sustainability Appraisal states that “travel plans are already required through Core Strategy Policy SP7; however, policies to make the environment attractive to non car users would contribute to SA Objective 10 as well as numerous national and regional policy documents”. The Agency would agree with this assessment and would support the development of policies to guide the implementation of a sustainable transport network through the plan making and planning process. It would also agree with the suggested benefit of a public transport study, to better inform the site allocation process and, most importantly, the need for a cumulative assessment of site allocations on highway capacity.

The Agency will support Selby District Council with this in subsequent consultations of the PLAN Selby Sites and Policies development. The Agency also invites Selby District Council to provide data on the site allocations for the Agency to run through its Network Analysis Tool (NAT), which assesses the cumulative impact of site allocations in plan making.

Q3 Please refer to the Duty to Cooperate Statement

http://www.selby.gov.uk/upload/FINAL_DTC_Statement.pdf

(Annex 4 to the Duty to Cooperate Statement)

http://www.selby.gov.uk/upload/Annex_4_Final_DTC_Statement.pdf

Please let us have your comments on the Duty to Cooperate Statement.

The Agency supports reference to the importance of partnership working, particularly with regards to cross-boundary transport issues that is relevant in Selby in the DRAFT Duty to Cooperate Statement. The Agency also acknowledges reference to NAT in the Duty to Cooperate Matrix.

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?

It is understood that 29% of housing growth will be allocated in the Designated Service Villages, with the rest being focused in the Principal Town of Selby (51%), and the two Local Service Centres Sherburn-in-Elmet (11%) and Tadcaster (7%).

In addition to the proposed approach to allocate housing proportionately across the Designated Service Villages, the Agency would suggest that an assessment of the impact on the demand for highway capacity is also considered, as well as access to facilities and sustainable transport options (in order to minimise impact on the road network).

However, it is understood that a Highways Study has recently been commissioned to examine the likely effects of scenarios of growth in the District to see which junctions and routes are likely to be affected. Therefore, the Agency would like to be consulted on the proposed methodology for the study as soon as possible, to ensure that the SRN is appropriately assessed and to ensure the development of a mutually-supported evidence base for the plan making process.

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?

The Agency notes from Figure 5 that "Accessibility" will be considered. The Agency supports this but would like the documentation to reflect the need for sustainable access, as opposed to a reliance on highway access. We would suggest that sites with good sustainable transport connectivity, located close to employment and essential services and facilities should receive a higher weighting for site allocation, as opposed to sites that are only accessible to highways and/or the SRN.

Q16 In the Selby District Local Plan, all Employment Allocations were considered suitable for all types of employment use (B1, B2 and B8). However in the light of the different roles of each of the towns, should PLAN Selby consider a different approach, for example being more specific about the types of employment uses on particular sites?

It is understood that an Employment Land Review is currently taking place.

The Agency would support policy that ensures that large trip generators (such as B1) are allocated to sites that have a good level of accessibility by sustainable modes, and/or in mixed use developments to minimise car use.

**You can view the accompanying Infrastructure Delivery Plan here http://www.selby.gov.uk/upload/FINAL_IDP.pdf
In general terms, there are no "show stoppers", but there are areas where investment is needed.**

Q25 Are there any infrastructure requirements that have not been identified, including small scale and local needs?

The Agency notes a large number of local transport schemes identified in the IPD to support the delivery of the Local Plan. There are no schemes identified on the SRN.

It is understood that a Highways Study has recently been commissioned. Section 4.9 states that the aim of the study is to establish the baseline position regarding highway capacity and traffic volumes, and setting out the likely effects of scenarios of growth in the District over the coming years to see which junctions and routes are likely to be affected.

The IPD suggests that this was expected to be completed in December 2014; however, JMP (on behalf of the Agency) has been informed by Selby District Council that the study is only in the early stages.

Section 2.6 states that "The HA's current position is that the level of development proposed within Selby is likely to have an impact on the strategic road network. SDC's highway study will inform PLAN Selby, and this information will be prepared in consultation with NYCC and the HA to enable them to provide more detailed comments on the scale and nature of the impact, and if any mitigation may be necessary."

Therefore, as stated previously, the Agency would like to be consulted as soon as possible on the proposed methodology used to undertake this study, to ensure that the SRN is appropriately assessed and to ensure the development of a mutually-supported evidence base for the plan making process.

The Agency expects that this Highways Study will inform the IDP. Indicative costs have been provided in the IDP for the purposes of the Community Infrastructure Levy (CIL), which is being developed through a separate exercise alongside PLAN Selby. If the study finds that operation of the SRN is at risk as a result of collective development in Selby, it may be necessary to explore if SRN schemes can be included on the CIL's Regulation 123 List.

The Agency would also like to be consulted on the development of proposals for CIL in Selby.

Development Management Policies Discussion and review of SDLP policies

Q30 a) Which topics should PLAN Selby concentrate on?

b) Which topics do not require any further detailed Development Management policy because the NPPF or Core Strategy policies are sufficient?

Transport and Highways

**Q32 a) Should PLAN Selby include further policies for any of the following?
travel plans**

parking standards
active traffic management
integrated demand management
capacity improvements
electric vehicle charging points
cycle routes
car parking

b) Are there other local transport schemes/issues that PLAN Selby should develop policies for?

The Agency notes 4.12 which states that "Improving the attractiveness of public transport and other forms of sustainable travel can be assisted through both positive and restrictive policies in PLAN Selby. PLAN Selby could consider a range of soft touch interventions such as demanding cycle parking and safe cycle routes in new developments, electric vehicle charging points".

As outlined in Circular 02/2013, the Agency will work with local authorities to understand the transport implications of development options, to identify opportunities to introduce travel plan and demand management measures through the Local Plan. If Selby District Council is minded to develop detailed policy on specific transport related issues, the Agency would be supportive of this approach. Indeed, any policy that will enable and encourage the use of sustainable transport will help to minimise future impacts, and likelihood of mitigation on the highway network.

I trust the above comments are helpful. It is acknowledged that PLAN Selby is in an early stage of the process and the Agency will look forward to working with Selby District Council on the detail of the site allocations as they come forward. If you would like to discuss any of the above, please do not hesitate to contact me.

Yours sincerely

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