



Development Policy
Selby District Council
Civic Centre
Portholme Road
Selby
North Yorkshire
YO8 4SB

Sent via Post & Email to: ldf@selby.gov.uk

16 February 2011

Your Ref: PHS/42/007

Our Ref: ST/wh/LS-082

Dear Sir

Selby District Submission Draft Core Strategy Publication Version, January 2011

Knight Frank LLP is instructed by their client, Mr Mike Dawson, to submit representations in relation to the above document. Our client's landholding, located east of Selby Road (A19), Whitley, comprises approximately 3 hectares of greenfield land with residential dwellings to the north, south and west of the site. A site location plan is enclosed.

I set out below comments which relate to the policies and supporting text set out in Draft Core Strategy Publication Version.

The Status of RSS and the Implications of the Localism Bill

We support the Council's approach of utilising the RSS evidence base for formulating Core Strategy policies. In particular, we are in agreement that the RSS housing targets remain within the Core Strategy and we believe that this is a reasonable approach to take at this time.

Vision

We are in agreement with the proposed Vision of the Core Strategy. We consider this to be an appropriate vision which recognises the rural nature of the district and need for new housing and employment. The vision and objectives are clear and thus meet the requirements of Planning Policy Statement 12 (PPS12), creating strong, safe and prosperous communities through Local Spatial Planning.

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Spatial Development Strategy

The approach to the Settlement Hierarchy is justified and therefore supported. We feel that all other reasonable alternatives have been considered and this is the most appropriate approach. The Background Papers (No. 5 and No. 6) provide a credible evidence base for the selection of the Designated Service Villages and we fully support these designations. Again, we consider this approach is supported by policies contained in PPS12.

Designated Service Villages

We fully support the designation of Eggborough/Whitley as a Designated Service Village. Eggborough and Whitley share an extensive range of facilities and the approach to their joint designation is supported.

The justification for promoting limited growth in Designated Service Villages, set out in Paragraph 4.25 is supported. Given the strength of this justification we consider there could be a case for more than 'limited growth', particularly in the larger and co-joined Designated Service Villages, which already offer a good level of local services and employment opportunities. We suggest that the word "*limited*" is removed as this will provide a more flexible and thus effective policy framework. Such an approach would be more in line with PPS12.

Other Locational Principles

The proposed 40% previously developed land (PDL) target is supported. We consider this approach provides some flexibility in relation to the acceptability of future site allocations and reflects the distinctive rural nature of the district. Having reviewed the Site Allocations Development Plan Document (SADPD) Issues and Options, January 2011, it appears likely that some localised Green Belt boundary reviews will be necessary to achieve the most sustainable and deliverable housing sites. We therefore consider that the supporting text, in paragraph 4.39 is emphasised and more flexibility added. By providing a more flexible framework in relation to likely/potential localised Green Belt Reviews, the Core Strategy will be more deliverable and effective. Again, we consider this would be supported by PPS12.

Policy CP1, Spatial Development Strategy

Whilst we are, in general, supportive of the approach suggested in Policy CP1, we consider the wording of section B, the sequential approach, should be amended. The sequential approach indicated is useful but shows little consideration of viability and deliverability. The viability and deliverability of site allocations will be imperative if the housing target is to be achieved and some consideration of this should be included in the policy. Some sites may be lower down the sequential assessment than others but be more deliverable, such sites should not be dismissed or delayed, particularly where there is a local housing need. Reference to viability and deliverability would assist the policy in terms of deliverability and flexibility and be supported by PPS12.



The Scale and Distribution of Housing – Context

We support the Council's decision to retain the net housing requirement of 440 dwellings per annum as per the RSS and agree that this is the most appropriate target to base the Core Strategy on. There is a credible and robust evidence base for this target. We consider the wording of this policy could be more flexible by indicating that the RSS target is not a ceiling figure and there could be future capacity to provide housing beyond the requirement.

Paragraph 5.22 refers to localised Green Belt Reviews being undertaken in certain cases. Again, we suggest this point is emphasised to add flexibility to the site selection process and the Council's ability to consider all reasonable alternatives. It appears likely some localised Green Belt will be required if the housing requirement is to be delivered and the Core Strategy should make it clear that this should be acceptable.

Policy CP2, The Scale and Distribution of Housing

We support the provision of 440 dwellings per annum up to the period 2026 as this is based on a credible and robust evidence base, i.e. the RSS. We consider further flexibility could be added to the policy by stating that the proposed provision is a minimum target.

We query the reduction in existing commitments by 10% to allow for non-delivery. It is unclear from where this figure has been derived, but our own market knowledge indicates that this figure should be significantly higher. Unless the Council can provide evidence that 10% is a realistic reduction, we suggest some market research is undertaken in order that the figure is based on a robust and credible evidence base. We currently consider this approach to existing commitments could be unsound and lead to a shortfall in long-term delivery.

Policy CP3, Managing Housing Land Supply

We support the approach of Policy CP3 and agree that the Council should actively encourage sites to be brought forward for development if there is a shortfall in supply. The Council should consider proposing a flexible phasing plan for site allocations as this could encourage development and thus reduce the chance of undersupply. Such an approach would be justifiable given the current economic situation and result in a more effective framework for managing housing land supply. We consider this would support the objectives of PPS12.

Policy CP4, Housing Mix

We consider this policy has been appropriately worded and provides a flexible framework for developers to contribute to housing need without being unnecessarily prescriptive. The policy is justifiable and effective and therefore considered to be sound.



Policy CP5, Affordable Housing

This policy appears unreasonably rigid in its approach. We suggest that the Council re-visits this policy and provides further wording regarding economic viability. The proposed 40% affordable provision seems unrealistic in the current economic climate and this should be recognised as there is a potential for the Core Strategy to stifle future development. Currently the policy only provides a short reference to “negotiation” and this should be stressed to provide developers with more certainty. By adding flexibility to the wording of Policy CP5, more affordable housing may be delivered and the policy would be more effective.

We trust that you take these comments into consideration. Should you have any queries regarding this submission, please do not hesitate to contact me.

Yours faithfully

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Associate

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Enc Site Location Plan

Cc Mr M J Dawson



8.5m

8.2m

A 19

GP

WHITEFIELD BUNGALOWS

SELBY ROAD

WHITLEY FARM CLOSE

Sunnymede

Inglewood

Whitfield Cottages

Whitley House

Whitley Farm Cottages

Church Row

Church View

All Saints' Church
Rainbow Cottage

Dunblair

Poplar House

Whitley Lodge

