

Selby District Council

Via E-mail – ldf@selby.gov.uk

10 August 2015

LET'S TALK PLAN SELBY

This response has been prepared on behalf of Persimmon Homes and Redrow Homes in relation to their land interests in 2005 Local Plan Safeguarded Land to the south of their extant permission in Sherburn in Elmet (Local Plan Reference SL1 and SHLAA site ref SHERBURN-7). A masterplan is currently being prepared to inform how the site would be developed including the links with the extant permission (SHB/1).

A combined Redrow/Persimmon application for 598 dwellings was granted planning permission subject to the completion of a Section 106 application on 12 September 2012 (Selby Council Planning Application References 2012/0399/EIA and 2012/0400/EIA) on land to the immediate north of the Safeguarded Land. The Section 106 Agreement was signed on 11th March 2014 and the formal Decision Notices were issued on 12th March 2014. Redrow and Persimmon remain committed to delivering housing in Sherburn and construction is underway on the extant permission for 598 dwellings, with the following projected completions.

	2015	2016	2017	2018	2019	2020	2021	2022	2023	TOTAL
Redrow	10	40	40	40	40	40	40	40	9	299
Persimmon	10	40	40	40	40	40	40	40	9	299

We consider that this existing safeguarded land to the immediate south of SHB/1 should be identified as an allocation in the PLAN Selby document.

There are a number of documents that form part of the Let's Talk Plan Selby consultation and the following are our specific comments to the relevant documents in relation to the site in Sherburn.

Strategic Housing Market Assessment

Q1 (SHMA) Do you have any comments on the:

f. need for different types and sizes of homes?

The 'Indicative targets by dwelling size' section of Chapter 7, in relation to market housing are recommended at paragraph 7.87 and at Table 59 as a 5% mix of 1 bed market properties; 35% 2 bed, 45% 3 bed and 15% 4 bed. Paragraph 7.88 states that:

“Although the analysis has quantified this on the basis of the market modelling and an understanding of the current housing market it does not necessarily follow that such prescriptive figures should be included in the plan making process. The ‘market’ is to some degree a better judge of what is the most appropriate profile of homes to deliver at any point in time.”

We support this view, however the 'Implications: Strategic Guidance on Housing Mix' on page 119 and at paragraph 9.61 contradicts this previous statement and says:

“The mix identified above should inform strategic District-wide policies.”

The 'recommended housing mix' should not be used as a policy to specify the mix of market housing. Such a policy should have regard to factors such as demand and aspiration.

Q1 (SHMA) Do you have any comments on the:

h. draft conclusions?

We note that the refreshed FOAN (figure 60 on page 153) supports the Core Strategy Policy approach and we reserve the right to make further comments on this matter at the next PLAN Selby consultation.

We agree with the reference made that Selby is not a self-contained market area. This therefore requires the Council to have full regard to the needs and delivery of adjoining authorities. Paragraph 9.54 states that *“by continuing to plan for a level of housing need above the OAN outlined in the document the Council can contribute to: reducing the reliance on the Private Rental Sector in meeting affordable housing need, meet the unmet need from surrounding and overlapping housing market areas or support employment growth above that expected in the REM forecasts.”* The reference to meeting unmet need from surrounding and overlapping housing market areas could be explored further. Whilst

the SHMA looks at migration patterns and travel to work patterns between Selby and York and the housing market area of Selby overlapping into York, the SHMA does not have regard to current failings and delays of the City of York Local Plan and the implications this has for the Selby District. The historic failing of City of York in terms of housing delivery has forced households to look elsewhere for their housing needs and including looking south to Selby District. This should be considered in the SHMA. Furthermore, the Leeds District continues to fail to meet its own Core Strategy target and this again has a degree of impact on the western side of the Selby District.

Draft Growth Options for Designated Service Villages

In the first instance it is considered that the Growth Options Report should be extended to include Sherburn in Elmet given that Sherburn is the most logical location for delivering housing should delivery not take place as expected in Selby or Tadcaster. This would be in accordance with the settlement hierarchy in the Core Strategy. There are the flood risk constraints in Selby and the recognised and long established landowner constraints in Tadcaster. Sherburn has the infrastructure, location and opportunities to provide additional housing. With this in mind it is considered that a report on the sustainability credentials of Sherburn in Elmet and constraints should be undertaken and reported, and growth options for Sherburn should be identified.

Q10 (DSV): 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? (Please note, we are in the process of updating evidence such as flood risk, accessibility, landscape and green infrastructure)

Given there is no Settlement Profile for Sherburn we have no comments on this section.

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

Clearly Option 1 'Proportionate dispersal across all Designated Service Villages', is contrary to Core Strategy Policy SP5-E which says "Allocations will be sought in the most sustainable villages (Designated Service Villages) where local need is established through a Strategic Housing Market Assessment and/or other local information." We are not aware of any justification to move away from the Core Strategy Policy.

Draft methodology for the identification of development limits

Q6 (DL) Do you have any comments on:

- a. the need to identify development limits in PLAN Selby?
- b. an alternative policy approach to protect the countryside?
- c. the proposed methodology for defining development limits?
- d. the conclusions about defining 'tight' development limits?

We welcome the suggestion that sites proposed as allocations following the housing and employment site selection process will be included within the Development Limits boundary. We do however question how a tightly drawn development limit to existing built up areas and the outer edge of new allocations can be made before the allocations are formally established. We consider a tightly drawn boundary will be potentially restrictive in later years of the plan and will not allow for the Plan to be flexible (contrary to Paragraph 14 of the NPPF), as it will not be able to readily adapt to rapid change. If the development limits are tightly drawn to include allocations, but delivery of certain allocations do not come to fruition, there is no mechanism, other than a review to allow for land outside the development limit in a different settlement, for example, to come forward.

The criteria for defining development limits at section 3.4 dismisses land adjacent to the existing development limit that has a weak functional relationship to the existing built form but does not allow for such a relationship to be altered by a carefully considered and well-designed proposal. Potential sustainable and deliverable land adjoining but outside a tightly drawn development limit will be restricted from coming forward if required, without a Plan Review, given the tightly drawn development limit. A more appropriate approach would be to favour a loosely drawn boundary based on character of a settlement and its sustainability, whereby land within the development limit is not all necessarily brought forward but specific criteria are set to ensure land comes forward when required.

Draft Method Statement for defining safeguarded land

Q7 (SL); Do you have any comments on the proposed approach to identifying safeguarded land set out in section 3 of the study?

We note the contents of the method statement and comment that the existing safeguarded land in Sherburn south of SHB/1 remains 'genuinely available for, and capable of development' in accordance with Figure 1. We consider the site will pass through the Housing Site Selection Methodology and ultimately be allocated for residential development.

Site Allocations – Draft Framework for Site Selection

Q9 (SS): Do you have any comments on:

- a. The overall approach to the site selection process set out in section 6.3 of the study?
- b. The details of the site assessment work proposed in Appendix A of the study?

Stage 1 - Initial Sift of the proposed site selection process.
We have no comments.

Stage 2 – Quantitative Assessment

A factor to be considered within this stage is the ability of a site to improve its accessibility and number of services. The allocation of a site may bring with it a new school and/or new shop and/or additional bus service for example, so the consideration of existing services and accessibility is highly relevant, as is the potential for development to enable improvements to accessibility and services.

In relation to flood risk, where part of a potential site falls within a higher risk flood zone this should not automatically result in the site being dismissed. This is particularly relevant for a large potential site where an area of higher risk flood zone may still leave an excellent development opportunity. In addition, consideration needs to be given to the potential to design appropriate uses within such areas e.g. open space.

Also in relation to flood risk, we would welcome the approach where the sequential test is applied to each settlement, rather than a District wide sequential approach.

Given the above comments, it is important that the development industry is engaged during the Quantitative Assessment to offer advice and comments and ensure that the development potential of a site is fully understood by the Council and sites are not removed at this stage unnecessarily.

Stage 3 – Qualitative Assessment

The Draft Framework refers to 'Officer Judgement', however we would welcome the input of the development industry to this qualitative assessment.

Stage 4 – Deliverability

We welcome the reference that planning judgement will be utilised to understand whether a site's boundary would enable the site to progress further rather than being discounted.

We look forward to being involved in future consultations in relation to PLAN Selby document and in the meantime if there are any queries relating to the site in Sherburn please do not hesitate to contact me.

Yours Sincerely

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