



**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 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	Redrow Homes and Persimmon Homes	Mark Johnson
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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

Please see attached statement

(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)

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

Mark Johnson

Dated

19th January 2015

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

**Completed comments forms must be received by the Council
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**

PLAN Selby – The Sites and Policies Local Plan – Initial Consultation

This submission has been prepared by Johnson Brook on behalf of Redrow Homes and Persimmon Homes who have an option agreement on the existing Safeguarded Land to the south of the existing residential allocation west of A162. The site is identified in the SHLAA and the 'Call for Sites' Map Book as site SHERBURN/011 Land adjacent to Prospect Farm, Low Street, Sherburn in Elmet.

It is considered that there is a justified case to promote this site from its current safeguarded status to a residential allocation, for development following the completion of the adjoining permitted allocation to the north.

PLAN Selby Aims and Objectives

Q5 a) Are these the right objectives?

Q5 b) Are there any others which should be included?

We have no comments in relation to the objectives but consider that an additional objective should be included in relation to areas of flood risk, bearing in mind the large areas of land within the District falling within Flood Zone 3. As currently drafted, there is no mention of flood risk or measures of dealing with development in areas of flood risk within the objectives.

Key Issues

Q6 a) Are these the right topics?

b) Is this a comprehensive list?

c) Which ones are most important and which ones are less relevant?

We consider that Topic T1 Providing Homes is one of the most important topics.

Topic T1 – Providing Homes

Whilst the PLAN Selby refers to the Core Strategy housing requirement, we consider reference should be built into the PLAN Selby document to the potential for the reassessment of the housing requirement, particularly in light of the updated household projections that are due to be released in February 2015. The PLAN Selby Local Plan document cannot hide behind the adopted Core Strategy and needs to ensure that it is consistent with National Policy as a stand-alone document, therefore reference should be made in the document to the housing requirement in the Core Strategy being up to date and consistent with National Policy and include reference to the housing requirement potentially being updated. There needs to be flexibility built into the allocations to account for an amended to the housing requirement if necessary.

Table 2 – The indicative amount of new allocations needed in PLAN Selby includes 2,500 in Selby. Looking at the 'Call for Sites' Map Book, it is clearly evident that there is little scope for accommodating any of this 2,500 requirement on land that is not in Flood Zone 3. It is considered unrealistic to expect enough achievable land to be found to safely accommodate 2,500 dwellings in Selby. As a result, sequentially, further land will be required in the next tier of the settlement hierarchy which is Tadcaster and Sherburn. Given the known landowner constraints within Tadcaster the most achievable option will be the allocation of additional land in Sherburn in Elmet. The identification and allocation of additional land in Sherburn will accord with Core Strategy Policy SP6 D which covers the potential land availability constraints of delivery in Tadcaster.

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

We have no comments in relation to the March 2015 base date and will make further comments at the next consultation once the figures have been updated.

While we welcome the removal of 10% of the outstanding planning permission to account for non-delivery, consented high density schemes in Selby Town need a further review as part of the 2015 SHLAA.

Whilst PLAN Selby is following the Core Strategy requirement to deliver homes across the district over a 16 year period to 2027, we are already in year 4 of the Core Strategy plan period, with only 12 years remaining. By the time the PLAN Selby Local Plan is adopted which at best will be during 2017 there will only be 10 years remaining of the Plan Period. Any Green Belt amendments as a result of the Green Belt review need to take into account development beyond the Core Strategy end date of 2027 and look to making boundary changes to potentially accommodate the development requirements of at least the next 20 years from the date of adoption.

Paragraph 83 of the NPPF in relation to Green Belt boundaries states that 'authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'

It is clear that additional land will be required, and a Green Belt review is scheduled to be undertaken this year. Given that this Safeguarded site lies outside the Green Belt, it is logical that this site is promoted to an allocation and that additional safeguarded land is identified, potentially from land currently within the Green Belt.

- 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 welcome the acknowledgement that the broad housing targets are minimum targets and encourage the Council in their plans to provide sufficient flexibility to deliver at least the minimum targets.

It is unfortunate that the latest AMR is not available for this consultation, but we will make further comments at the next consultation in relation to the latest 5 year supply position. Based on the 2013 AMR it is clear that housing has been consistently under delivered in the district in 7 out of the last 10 previous years. Clearly measures need to be put in place to bring forward sites more readily in order to increase the housing building rate in the District in line with the annual requirement. A more detailed review of existing consents should be a priority to identify those which may not be viable.

We consider that PLAN Selby should over-allocate and allocate more sites than are needed in order to provide choice. This approach conforms with National Policy, and it would also build in flexibility should the housing requirement increase and should some sites not come forward as envisaged. We also consider that additional contingency sites are identified throughout the district, which equates to additional safeguarded land.

The combination of applying a 20% NPPF threshold for persistent under-delivery as well as a catch up figure to meet the housing need not covered in recent years, along with the difficulty of allocating sites in Selby due to viability and Flood Risk issues and the known landowner constraints in Tadcaster leads to a very strong case for introducing an additional residential allocation in Sherburn. A logical additional residential allocation is this existing safeguarded site, located to the immediate south of an existing allocation that has been granted permission for the same housebuilders who have an option contract with this site.

Q59 – Do you have any comments on the evidence that the Council considers necessary?

Table 11 Evidence Base

The Post Initial Consultation includes a Green Belt / Strategic Countryside gaps / Development Limits review with an indicative timetable of being prepared between November 2014 and September 2015.

This is a fundamental piece of evidence that will affect the allocations within the District and it would seem that the Green Belt review should be undertaken as soon as possible given its influence on the progress of the Sites and Policies Local Plan.

The Green Belt Review is currently being commissioned and work has not yet commenced. It is understood that a Green Belt Review will be completed in time for the next consultation of the Sites and Policies Local Plan which is due to commence in late 2015.