

Selby District Council

Via E-mail – [ldf@selby.gov.uk](mailto:ldf@selby.gov.uk)

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### **LET'S TALK PLAN SELBY**

This response has been prepared on behalf of Redrow Homes in relation to their land interests in the 2005 Local Plan Safeguarded Land in Hillam. Redrow are currently preparing a full planning application for 60 dwellings which will be submitted to the Council shortly. Given this site is the only remaining Safeguarded site in the combined Designated Service Village we consider that this site should be identified as an allocation in the PLAN Selby document.

The site has been the subject of a pre-application meeting with the Local Planning Authority in January 2015. The outcome of that meeting found the principle of development on this site to be acceptable. A representative of Redrow Homes and Johnson Brook met with Hillam Parish Council on 3<sup>rd</sup> June 2015 and a public consultation event took place on 22<sup>nd</sup> July 2015, attended by residents of Hillam and Monk Fryston.

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 Redrow site in Hillam.

**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, as 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 doesn't 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 will force people to look elsewhere for their housing needs and this may include 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**

**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)*

The Settlement Profile for Monk Fryston and Hillam (Appendix B13). Figure 5 showing the location of proposed development sites should include Hillam as well. Table 3 on the previous page references the 12 potential development sites in the SHLAA in Monk Fryston and Hillam but these cannot all be seen on Figure 5 given that it only includes Monk Fryston.

There is no reference in the land supply section of Appendix B13 to the proposed development of 9 dwellings on land at Abbeystone Way, Monk Fryston that is pending consideration.

A planning application was validated on 28<sup>th</sup> May 2015 for the development 9 dwellings on land at Abbeystone Way, Monk Fryston (2015/0461/FUL). This is a brownfield site within the development limit, not within the Green Belt and not within the SHLAA.

A planning application will be submitted shortly for 60 dwellings on Safeguarded Land not within the Green Belt (SHLAA site Hillam 1). This equates to potential for 69 dwellings to be delivered in Monk Fryston and Hillam on land outside the Green Belt. Option 3 at section 7.4 of the report is incorrect in that it places Monk Fryston / Hillam within the category of

‘Settlements constrained by the Green Belt’ and therefore distributes no new additional dwellings to Monk Fryston / Hillam. This is misleading and clearly incorrect given the potential for 69 dwellings, as mentioned above, on land outside the Green Belt yet within Monk Fryston / Hillam. This detail should be included within the report.

**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.”

**Q12 (DSV):** *Are there any better ways/options of determining how many new dwellings should be built in each of the Designated Service Villages up to 2027?*

We consider there is an alternative option of a combination of options 2 and 3 whereby services and accessibility are considered alongside Green Belt constraints, such that DSV’s which in combination have good accessibility and services and fewer Green Belt constraints receive a higher proportion of development. This option would need to take into account existing available land outside the Green Belt in DSV settlements where Green Belt is otherwise a constraint.

## **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 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 Hillam remains 'genuinely available for, and capable of development' in accordance with Figure 1 and therefore consider the site should 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?

We have no comments in relation to Stage 1 Initial Sift of the proposed site selection process.

#### **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 whilst 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. 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 in relation to this stage, it is important that the development industry is engaged at this stage to offer advice and comments and ensure that 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 Hillam please do not hesitate to contact me.

Yours Sincerely

Richard Mowat MRTPI  
Director