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**Michelle Dinsdale**

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**From:** Jennifer Hadland [jennifer.hadland@smithsgore.co.uk]**Sent:** 01 February 2012 09:51**To:** ldf**Subject:** Submission Draft Core Strategy - representation on behalf of YDBF**Attachments:** Core Strategy comments Jan2012.pdf; FINAL\_SDCS\_rep\_form\_Jan\_2012.pdf

Dear Sirs

Please find attached a response to the above consultation on behalf of our client, the York Diocesan Board of Finance.

I would be pleased if these comments can be taken into account during the preparation of the forthcoming DPD and would ask that I am kept informed of all future consultations during the LDF process.

I would very much appreciate if you could confirm receipt of this email and the attachments and, if you require any further information, please do not hesitate to contact me.

Kind regards

Jennifer

Jennifer Hadland • BA (Hons) MSc MRTPI

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**Selby District Council  
Proposed Changes to the Submission Draft Core Strategy**

**Response by Smiths Gore on behalf of York Diocesan Board of Finance**

**Introduction**

We act on behalf of York Diocesan Board of Finance (YDBF) in respect of their landholdings across the district of Selby.

We have the following comments to make with regard to the Proposed Changes to the Submission Draft Core Strategy, in particular, "the overall scale of housing development over the plan period" as specified in the Inspector's Ruling.

**Overall Scale of Housing**

YDBF welcomes the assertion that the majority of new development will be focused towards the Principal Town of Selby, and the other market towns, however, it is vital that the Council do not restrict future development throughout the rest of the district. The Council should **not** seek to obstruct the growth of the rural economy as rural settlements are crucial to achieving economic growth through a stable and self sustaining population, employment opportunities and a range of well supported local services.

To be able to accommodate development across the entire district YDBF support the proposed increase in the district's housing targets from 440 dwellings per annum to 450 dwellings per annum as an annual average over the Plan period, particularly as the figure is based on a robust review of both population and household projections.

Notwithstanding this, YDBF do question the proposed distribution of new housing. As the majority of the Selby's population lives in the more rural parts of the district, there are concerns that these communities are not going to benefit from the much needed future development during the Plan period, particularly with only 2% of all development during the Plan period being focused towards Secondary Villages. The proposed 2% equates to approximately only 10 dwellings per annum and includes contributions from existing commitments only.

Although we support the proposed scale of housing, we question the proposed distribution of the development up to 2027. New allocations, albeit small allocations, should be identified in Secondary Villages throughout the District.

Secondary Villages also have a key role to play in helping to maintain the vitality of the District's rural areas, broadening the economic base and creating a balanced and self sustaining population. YDBF therefore strongly disagree with the Council's suggestion that no sites will allocated for future development within the Secondary Villages.

Secondary Villages that the YDBF consider suitable for some small scale future growth include:

- Barkston Ash;
- Birkin;
- Chapel Haddlesey;
- Drax;
- Ryther;
- Saxton; and,
- Wistow

It is important to enable development across the district in a variety of different settlements benefiting a range of communities. These settlements represent focuses for ministry within the Diocese of York within the Selby District area and, as such, the Church of England would wish to support growth and investment into these communities.

### **Affordable Housing**

We note that the only development considered suitable by the Council in Secondary Villages is 100% affordable housing. We would question the viability of this type of development as 100% affordable housing sites are often not a feasible solution and, in our experience, are very rarely delivered. This could lead to an acute shortage of housing in the Secondary Villages (both market units and affordable units) and cause a decline of the fabric of the communities, their services and facilities during the Plan period.

Affordable housing is not the only form of development that the smaller settlements need. While it is recognised that affordable housing is required, the viability of this type of development negatively affects the overall choice of housing (market or affordable) in smaller settlements. Market and affordable housing, along with employment opportunities, are required in all settlements to ensure vitality and viability of the existing communities.

### **Conclusion**

It is submitted that the Council should not seek to hinder the growth of more rural areas of the District. As we establish above, rural settlements are crucial to achieving economic growth through a stable and self sustaining population, diversified employment opportunities and a range of well supported local services and facilities. We would therefore suggest that the Council give due consideration to a more flexible approach to allowing new development in the smaller rural settlements.

YDBF fully support the future development of Designated Service Centres, particularly within the settlements of Brayton, Hemingbrough, Carlton and South Milford. They also support some future growth in the following settlements:

- Barkston Ash;
- Birkin;
- Cawood;
- Chapel Haddlesey;
- Drax;
- Fairburn;
- Hambleton
- Monk Fryston
- Ryther;
- Saxton;
- Sherburn in Elmet;
- Thorpe Willoughby and,
- Wistow

Should you therefore have any queries regarding future development in the area which falls within YDBF's ownership, or have any queries regarding the content of this response, please do not hesitate to contact us.

## Selby District Submission Draft Core Strategy

### Consultation on Proposed Changes

January 2012

### Representation Form

## Planning and Compulsory Purchase Act (2004), Town and Country Planning (Local Development) (England) Regulations 2004 and (Amendment) Regulations 2008 and 2009

### Part A

An Examination in Public into the soundness of the Submission Draft Core Strategy (SDCS) was held between 20 and 30 September 2011 in front of an Independent Inspector.

The examination has been suspended to allow the Council to address the following three topics, as set out in the Inspector's Ruling:

- (i) The strategic approach to Green Belt releases;
- (ii) The scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt;
- (iii) The overall scale of housing development over the plan period.

The Council is now carrying out a consultation directly with participants on the changes to the Core Strategy arising from its consideration of these three topics.

Subject to the outstanding matters above, the examination into the other "Matters and Issues" identified by the Inspector has been completed. All parties have had the opportunity to participate in the hearing sessions and the Inspector has the information necessary to enable him to prepare his report. Consequently no further evidence should be submitted to the examination at this stage; any further evidence received by the Programme Officer is likely to be returned.

When the examination resumes, hearing sessions will be arranged which will focus solely on the above matters. As already stated, the suspension should not be used as an opportunity to revisit matters which have been fully considered during the September 2011 hearing sessions.

**Representations are therefore invited as part of this consultation on the Proposed Changes to the Submission Draft Core Strategy.**

Please complete separate copies of Part B of this form for each of your separate points. It would be helpful if you could focus on the "tests of soundness" and indicate if you are objecting on a legal compliance issue.

**Completed representation forms must be returned to the Council no later than 5pm on Wednesday 15 February 2012**

Email to: [ldf@selby.gov.uk](mailto:ldf@selby.gov.uk)

Fax to: 01757 292229

Post to: Policy Team, Selby District Council, Civic Centre, Doncaster Road, Selby YO8 9FT

## **The Tests of Soundness**

Soundness is explained in PPS12 (Planning Policy Statement 12) in paragraphs 4.36 - 4.47, 4.51 and 4.52 and the boxed text. Specifically paragraph 4.52 states that to be sound a Core Strategy should be:

### **1 Justified**

PPS12 provides that to be 'justified' a DPD (in this case the 'Core Strategy') needs to be :

- founded on a robust and credible evidence base involving:
  - evidence of participation of the local community and others having a stake in the area
  - research/fact finding - the choices made in the plan are backed up by facts
- the most appropriate strategy when considered against reasonable alternatives

### **2 Effective**

PPS12 states that Core Strategies should be effective. This means:

- Deliverable - embracing:
  - Sound infrastructure delivery planning
  - Having no regulatory or national planning barriers to delivery
  - Delivery partners who are signed up to it
  - Coherence with the strategies of neighbouring authorities
- Flexible
- Able to be monitored

### **3 National Policy**

The DPD (in this case the 'Core Strategy') should be consistent with national policy. Where there is a departure, the Local Planning Authority (LPA) must provide clear and convincing reasoning to justify their approach.

**Contact Details** (only complete once)

Please provide contact details and agent details, if appointed.

Personal Details	Agents Details (if applicable)
Title	
First Name	Jennifer
Last Name	Hadland
Job Title (where relevant)	Planner
Organisation	Smiths Gore
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Address Line 2	Darlington
Address Line 3	
County	
Postcode	DL3 7JX
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Email address	jennifer.hadland@smithsgore.co.uk

**You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B (pages 4 - 6) to this part of the representation form.**

**It will be helpful if you can provide an email address so we can contact you electronically.**

**Part B (please use a separate sheet (pages 4 - 6) for each representation)**

**Please identify the topic to which this representation refers:**

- (i) The strategic approach to Green Belt releases;
- (ii) The scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt;
- (iii) The overall scale of housing development over the plan period.

Please state the specific Proposed Change number: **PC**  
(which can be found on the Published Schedule, CD2e)

5.26-Appendix 2: Proposed Revised Policy CP2

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**Question 1: Do you consider the Proposed Change is:**

- 1.1 Legally compliant  Yes  No
- 1.2 Sound  Yes  No

If you have entered No to 1.2, please continue to Q2. In all other circumstances, please go to Q3.

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**Question 2: If you consider the Proposed Change is unsound, please identify which test of soundness your representation relates to:**

(Please note you should complete separate Part B (pages 4 - 6) of this form for each test of soundness you consider the Core Strategy fails.)

2.1 Justified

(Please identify just one test for this representation)

2.2 Effective

2.3 Consistent with national policy

**Question 3:** Please give details of why you consider the Proposed Change is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Proposed Change, or provide any other comments please also use this box to set out your comments:

Please see the attached sheet.

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

**Question 4:** Please provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound, having regard to the test you have identified in Q2 where this relates to soundness. You will need to say why this change will make the Core Strategy DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see the attached sheet.

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

**PLEASE NOTE** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.**



**Question 5: Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate at the oral part of the examination?**

5.1 Written Representations

5.2 Attend Examination

5.3 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

*(Your request will be considered by the Inspector, however, attendance at the Examination in Public is by invitation only).*

N/A

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

**Representation Submission Acknowledgement**

I acknowledge that I am making a formal representation. I understand that my name (and organisation where applicable) and representation will be made publically available during the public examination period of the Core Strategy in order to ensure that it is a fair and transparent process.

I agree with this statement and wish to submit the above representation for consideration.

**Signed** J.Hadland

**Dated** 31/01/2012