



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	Mr and Mrs Bramley	Mark Johnson
Address	c/o Agent	Johnson Brook Coronet House Queen Street Leeds
Postcode		LS1 2TW
Telephone no.		1,138,870,120
Email address		mark@johnsonbrook.co.uk

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 landowners of land to the south of Sherburn in Elmet. This written policy response should be read alongside a promotional document that provides further information on the site specific merits of the removal of these parcels of land from the Green Belt.

It is proposed that each parcel of land in question is considered for release from the Green Belt and either designated as Safeguarded Land and included within the Development Limit of Sherburn in Elmet or allocated for residential development.

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 Zones 2. 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 amendment 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 late 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.'

- 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 7 out of the

10 previous years. Clearly measures need to be put in place to bring forward sites more readily in order to increase the house 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 also builds 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.

Q24 – How should PLAN Selby determine how much Safeguarded Land should be designated for potential future use?

As stated previously, the PLAN Selby document should be flexible and the identification of additional safeguarded land will contribute towards this flexibility. The Green Belt review will identify suitable land for removal from the Green Belt which would logically be therefore identified as Safeguarded Land. There is also other land not necessarily in the Green Belt that it will be possible to identify as Safeguarded land. In terms of the amount of Safeguarded Land to be designated we consider, similar to the Leeds approach, that land is identified to cover an absolute minimum of 10% of the housing requirement over the plan period.

Q39 a) How should Sherburn in Elmet grow and develop – what could a vision say?
b) What else is needed in Sherburn in Elmet that could be allocated a site?

Based on the detail elsewhere in this statement and the attached document, we consider that the three parcels of land to the south of the Sherburn in Elmet settlement should be considered for removal from the Green Belt and inclusion in the Development Limit as Safeguarded Land

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

Table 11 Evidence Base

The 'Post Initial Consultation' element of Table 11 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.

We would formally request that consideration is given to land to the immediate south of the Sherburn in Elmet development limit and that the three parcels of land in our clients ownership are considered for release from the Green Belt.

Land to the south of Sherburn-in-Elmet



CONTENTS

1.	INTRODUCTION	3
2.	PLANNING CONTEXT	4
3.	SUSTAINABILITY AND INTEGRATION	5
4.	SITE CHARACTERISTICS	7
5.	CASE FOR DEVELOPMENT	10

1. INTRODUCTION

1.0 INTRODUCTION

Johnson Brook Planning and Development Ltd have been appointed by the Bramley Family to promote Land south of Sherburn-in Elmet. The three proposed land parcels are all currently designated as Green Belt within the Selby District Coucil Local Plan (Adopted October 2013)

The three land parcels owned by the Bramley family total 21.4 hectares and are all located immediately to the south of the existing settlement of Sherburn-in-Elmet. There is an adjacent parcel of land immediately to the north of parcel 3 (see plan at Section 3 Sustainiability and Integration) that is safeguarded for housing.

The purpose of this brochure is to promote the land for future residential use to Selby District Council. The Site Allocations Plan is in its consultation phase with comments and representations to be received by 19th January.

At this Point Selby District Coucil have stated they are not consulting on specific site allocations but are focusing on how they will choose the best sites to deliver the aims of the Core Strategy.

This promotional brochure provides the planning policy context relevant to the locality (Section 2), a location diagram to illustrate the sustainability credentials of the land parcels and how they integrate with their surroundings (section 3) and a description of the site characteristics of each of the land parcels and their suitability for development (Section 4).

2. PLANNING CONTEXT

National Policy

The National Planning Policy Framework (adopted March 2012) sets out the Government's planning policies for England and how these are expected to be applied. The main purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

An economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

A social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

An environmental role - contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy (paragraph 7).

At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking (paragraph 14).

"Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth" (paragraph 17).

The National Planning Policy Framework states in respect of plan making and local plans that Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.

The Government's key housing objective in the National Planning Policy Framework is "To boost significantly the supply of housing" (paragraph 47). In his announcements which accompanied the Framework, the Minister for Planning emphasises the three objectives for planning reform, one of which is "to ensure that we support the building of homes that the next generation will need."

To deliver this objective the Framework requires local planning authorities to "ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" (paragraph 47).

"Relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites." Where a local planning authority cannot demonstrate a five year supply of deliverable sites, existing policies relating to supply of housing will be considered out of date and the case for the presumption in favour of sustainable development will carry greater weight in the determination of planning applications" (paragraph 49).

The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development" (paragraph 52).

Paragraph 83 of the Framework states "local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan".

Paragraph 84 states "when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development".

Paragraph 85 states "when defining Green Belt boundaries, local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development and not include land

The National Planning Policy Framework states at paragraph 80 that the Green Belt serves five purposes. In section 4 each of the land parcels is assessed against these purposes in order to promote their suitability for development.

Local Policy

The Selby District Local Plan was adopted in October 2013 and forms the current development plan for Selby District. Following the approval the Council has set out a new Local Development Scheme for 2013 - 2016.

“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.

PLAN Selby will incorporate site allocations, site specific designations and proposals and policies, which are necessary and appropriate for Selby District to deliver the Core Strategy within national policy.

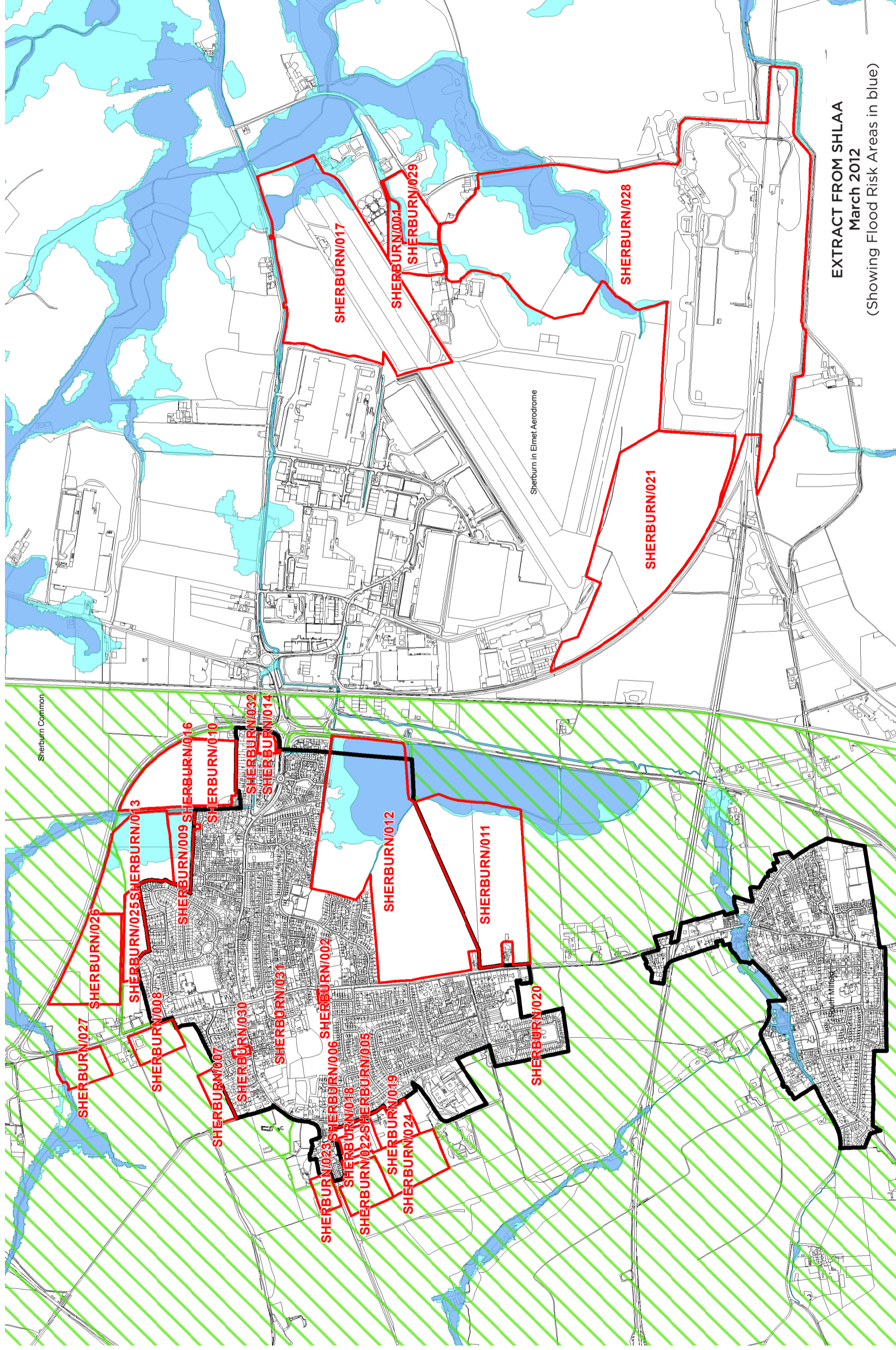
Core Strategy Policies

T1: Providing Homes

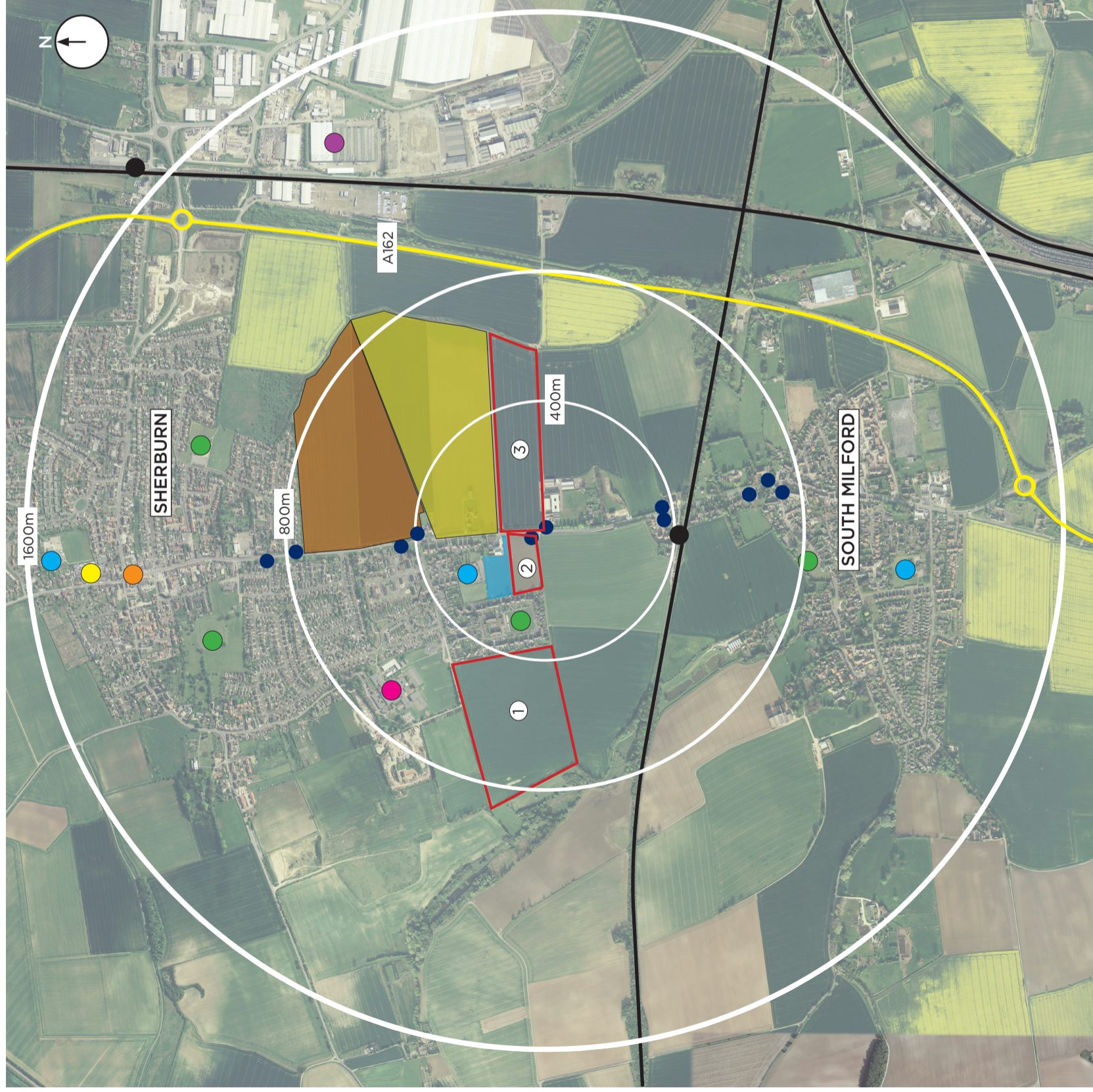
The Core Strategy sets the need to deliver 7200 new homes across the District over a 16 year period to 2027, which equates to a requirement to build 450 new homes per year.

The Core Strategy sets out the settlement hierarchy for where this new development will go. For each of the 3 towns of Selby, Tadcaster and Sherburn in Elmet the Core Strategy already provides broad minimum targets.

New development will be focused on Selby as the principal town with Sherburn and Elmet one of two service towns requiring their own allocations to meet specific local housing needs. The remainder of the required housing need will be provided within the 18 service villages within the District.



3. SUSTAINABILITY AND INTEGRATION



Key

- Site boundary
- ① Potential development parcel (within existing Green Belt)
- Land set aside for potential primary school extension
- Safeguarded Land (Housing)
- Land with development consent
- Main Road
- Railway
- Primary School
- Secondary School
- Medical Facility
- Local Shops
- Employment area
- Public park/open space
- Station
- Bus Stop within 10 mins walk of sites

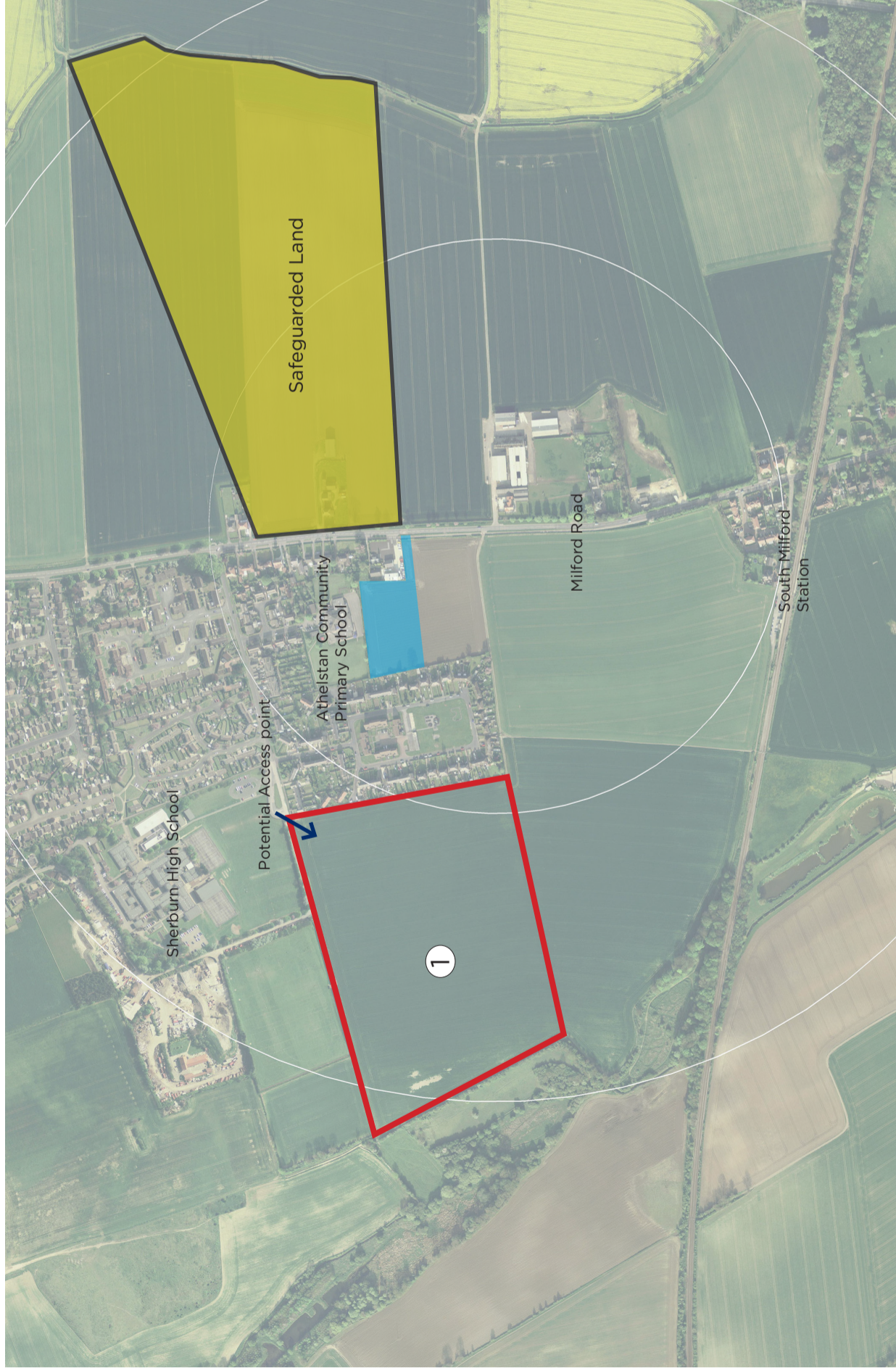
Sherburn in Elmet is one of the three major settlements in the Selby District. It has a population of 6,657 (2011 Census) providing essential convenience retail, and other services and facilities for the immediate needs of the local community, South Milford and surrounding rural areas. It has a vibrant centre with successful local businesses.

Sherburn is in close proximity to the A1 and two stations are within an easily accessible distance.

There are easily accessible employment opportunities available at established industrial sites just off the A162 namely Moor Lane Trading Estate and Sherburn Enterprise Park just below the airfield. These two sites are edge of town locations with the capacity for future expansion and therefore future jobs creation.

4. SITE CHARACTERISTICS

Parcel 1 South of Sherburn High School



The first proposed land parcel covers an area of 12 hectares, with an additional slither of the adjoining field to the south possibly required in order to link the other parcels.

It is within the existing Green Belt and lies to the south of Sherburn High School. There is existing residential development on the eastern boundary of this parcel which forms the southernmost extent of the settlement of Sherburn-in-Elmet.

The land is located off New Lane 1km from Sherburn-in-Elmet village centre and 1km north of the neighbouring village of South Milford.

South Milford station is 500m away, offering a regular train service between Leeds and Selby. There are also regular bus services, with several available stops within close proximity on Milford Road.

The table opposite assesses the site in relation to the purposes of the Green Belt as described in the National Planning Policy Framework (NPPF).

The development of the site would not lead to a southerly extension of Sherburn towards South Milford and would be well contained by existing vegetation to the west.

NPPF Green Belt Test

Purposes of including land within the Green Belt	How development of this site would impact upon these purposes
<p>1. To check the unrestricted sprawl of large built-up areas</p>	<p>The development of the first land parcel south of the high school requires its removal from the green belt. The current green belt covers a wide area of low lying land surrounding Sherburn and South Milford and lacks any consistent containment by topographical or landscape features. There is a lack of consistent containment by topographical or landscape features to the immediate south of Sherburn-in-Elmet.</p> <p>The development of this site represents an opportunity to deliver housing required in Sherburn in the plan period and create a defensible landscape buffer to the west and south of the town. Further to this many of the sites within the SHLAA are in flood risk zones 2 and 3 and subject to further investigation by the council may not be deliverable.</p>
<p>2. To prevent neighbouring towns merging into one another</p>	<p>Development of this land parcel would require the development limits of the town to be adjusted in line with the proposed alteration to the green belt.</p> <p>Sherburn and South Milford could be protected from any future coalescence by providing a coherent landscape buffer to the southern boundary and the utilisation of existing vegetation to the west.</p>
<p>3. To assist in safeguarding the countryside from encroachment</p>	<p>These landscape buffers would act as defensible edges to the green belt, that lie in close proximity to the existing settlement of Sherburn.</p>
<p>4. To preserve the setting and special character of historic towns</p>	<p>This particular purpose of Green Belts only applies to a limited number of historic towns in this country including for example Chester and York.</p>
<p>5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>Sherburn and South Milford are settlements with a rural setting and therefore do not have a significant amount of brownfield land to deliver housing.</p>

Parcel 2 South of Athelstan Primary School



The second proposed land parcel covers an area of 1.7 hectares and is immediately to the south of land adjoining Athelstan Community Primary School, off Milford Road.

It is proposed to set aside part of the field to the south of the school in order that it has capacity for future expansion.

The land is within the existing Green Belt. There is existing residential development on the western boundary of this parcel at the southernmost extent of the settlement of Sherburn-in-Elmet and a Protected Area of search is located to the north east.

The village centre of Sherburn-in-Elmet is 1.1km away and the neighbouring village of South Milford is 700m to the south.

South Milford station is 400m away, offering a regular train service between Leeds and Selby. There are also regular bus services, with several available stops within close proximity on Milford Road.

The table opposite assesses the site in relation to the purposes of the Green Belt as decreed in the National Planning Policy Framework (NPPF).

The development of the site would allow for future expansion of the primary school and a form a legible end stop to the settlement.

NPPF Green Belt Test

Purposes of including land within the Green Belt	How development of this site would impact upon these purposes
<p>1. To check the unrestricted sprawl of large built-up areas</p>	<p>The development of the second land parcel below the primary school requires its removal from the green belt. The current green belt covers a wide area of low lying land surrounding Sherburn and South Milford. There is a lack of consistent containment by topographical or landscape features to the immediate south of Sherburn-in-Elmet.</p> <p>The development of this site represents an opportunity to deliver housing required in Sherburn, in the plan period, and create a defensible landscape buffer immediately beyond its current development limit to the south of the town.</p> <p>Further to this many of the other sites within the SHLAA are in flood risk zones 2 and 3 and subject to further investigation by the council may not be deliverable.</p>
<p>2. To prevent neighbouring towns merging into one another</p>	<p>Development of this land parcel would require the development limits of the town to be adjusted in line with the proposed alteration to the green belt.</p> <p>Sherburn and South Milford could be protected from any future coalescence by providing a coherent landscape buffer to the south.</p>
<p>3. To assist in safeguarding the countryside from encroachment</p>	<p>This landscape buffer would act as a defensible edge to the green belt, that lies in close proximity to the existing settlement of Sherburn.</p>
<p>4. To preserve the setting and special character of historic towns</p>	<p>This particular purpose of Green Belts only applies to a limited number of historic towns in this country including for example Chester and York.</p>
<p>5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>Sherburn and South Milford are settlements with a rural setting and therefore do not have a significant amount of brownfield land to deliver housing.</p>

Parcel 3 East of Milford Road



The third proposed land parcel covers an area of 7.7 hectares. It is located to the east of Milford Road (opposite Parcel 2) and is immediately to the south of a Protected Area of Search (PAS) and within the existing Green Belt.

The land is located to the east of Athelstan Community Primary School at the southernmost extent of the settlement of Sherburn-in-Elmet, at a distance of 1200m from the village centre. South Milford lies within 10 mins walk at a distance of 800m to the south.

South Milford station is 400m away, offering a regular train service between Leeds and Selby. There are also regular bus services with several available stops within close proximity on Milford Road.

The table opposite assesses the site in relation to the purposes of the Green Belt as described in the National Planning Policy Framework (NPPF)

The future development of the Safeguarded Land and consented development to the north provide potential to create links to existing and proposed infrastructure and services.

NPPF Green Belt Test

Purposes of including land within the Green Belt	How development of this site would impact upon these purposes
<p>1. To check the unrestricted sprawl of large built-up areas</p>	<p>The development of the third land parcel to the east of Milford Road requires its removal from the green belt. The current green belt covers a wide area of low lying land surrounding Sherburn and South Milford and lacks any consistent containment by topographical or landscape features to the immediate south of Sherburn-in-Elmet. There is a lack of consistent containment by topographical or landscape features to the immediate south of Sherburn-in-Elmet.</p> <p>The development of this site represents an opportunity to deliver housing required in Sherburn, in the plan period, and create a defensible landscape buffer to the south of the town and protected area of search.</p> <p>Further to this many of the other sites within the SHLAA are in flood risk zones 2 and 3 and subject to further investigation by the council may not be deliverable.</p>
<p>2. To prevent neighbouring towns merging into one another</p>	<p>Development of this land parcel would require the development limits of the town to be adjusted in line with removing it from the green belt.</p> <p>Sherburn and South Milford could be protected from any future coalescence by providing a coherent landscape buffer to the southern and eastern boundaries.</p>
<p>3. To assist in safeguarding the countryside from encroachment</p>	<p>These landscape buffers would act as a defensible edges to the green belt, that lie in close proximity to the existing settlement of Sherburn.</p>
<p>4. To preserve the setting and special character of historic towns</p>	<p>This particular purpose of Green Belts only applies to a limited number of historic towns in this country including for example Chester and York.</p>
<p>5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>Sherburn and South Milford are settlements with a rural setting and therefore do not have a significant amount of brownfield land to deliver housing.</p>

5. CASE FOR DEVELOPMENT

At this stage Selby District Council are not considering specific sites as they are in the consultation phase of 'Plan' Selby which sets out how they will deliver the aims of the Core Strategy in terms of allocating sites for housing.

The Council are currently in the process of commissioning various studies to provide the evidence base for Plan Selby. This will include various site specific assessments and a review of the green belt and development limits. These studies will take until 2017 to be reported on which leaves a period of only 10 years till the end of the current Local Plan period (2027).

This document has set out the case for releasing the three sites from the existing green belt after having assessed their sustainability credentials and specific individual characteristics and constraints. It has also demonstrated that a large proportion of the sites within the Selby District as assessed in the Strategic Housing Land Availability Assessment (SHLAA) are within Flood Zones 2 and 3 and so are not likely to be deliverable without comprehensive flood mitigation measures being implemented.

The development of the sites would when added to consented development and safeguarded land in Sherburn provide a contingency against other sites not being delivered and future increases in housing requirement within the District.