



SIGNET PLANNING
VISION | STRATEGY | ACTION

JEH/LR/HG2395

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7 August 2015

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Dear Sir/Madam

LET'S TALK PLAN SELBY: 29 JUNE 2015 TO 10 AUGUST 2015

Signet Planning have been instructed by Mrs D Lawn to promote land to the immediate east of Monk Fryston, which represents a natural extension to the urban area of the village (and with respect to which various submissions have been made including a landscape and visual impact assessment). It is in this context that the draft studies and evidence base to the next stage of the emerging Local Plan have been reviewed and the following comments made (with reference being made to the relevant documents and questions set out therein).

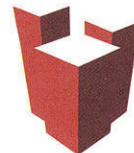
Questions on the Draft Strategic Housing Market Assessment (SHMA)

Q1A: The housing market area in and around Selby

All the evidence available demonstrates that Selby is not a self-contained market area and the Council therefore needs to have full regard not only to its projected assessed needs but also those within adjoining Council areas with which it shares its housing market area.

Q1B: Trend based demographic projections

It is appropriate to use the latest set of sub-National Population Projections (SNPP) as published on 29 May 2014 as being the most up to date available, as well as the 2012 SNHP. However, given the impact of the recession upon headship rates, consideration should also be given to 2008 based projections, as common for many other SHMAs. For instance, we have noted the significant difference between the 2008 and 2012 based projections for the 25 to 34 age group. This group is particularly important for household formation and has been directly affected by the recession, with clear evidence that the number of household has been reduced. Reliance upon the 2012 figures alone suggests a decline within this age group which is unlikely to be the case in the light of the more recent economic upturn, and a range of Government initiatives. The early evidence is that household numbers will increase beyond the 2012 projections, and therefore a positive adjustment is required.



Q1C: Economic led projections

The SHMA identifies at Table 21 significant increases in the assumed rates of employment which are not consistent with the projected decrease in Figure 22 of the same period. Further explanation is therefore required with respect to this matter to ensure it is robust and in order to better inform the objectively assessed housing need.

Q1D: Affordable Housing Need

There is a clear need for affordable housing within the district, but the study does not take account of economic viability considerations. Further evidence therefore needs to be provided with respect to the affordable housing needs of the district, how these may change within different sub-market areas, as well as taking account of viability and the ability to deliver affordable housing.

Q1E: Market Signals

In accordance with the advice to the NPPG, it is appropriate for the Council to consider market signals and the use of comparable areas. In order to correctly plan for the future, the Council needs to review market signals to assist in objectively assessing housing need. Further consideration, therefore, needs to be given to these matters and clarity and justification provided with respect to the approaches advocated.

Q1F: Need for different types and sizes of homes

The importance of the 'market' is recognised, but, as proposed, appropriate monitoring should be undertaken in order to assist in a balanced delivery in the future (particularly in light of recognised demographic changes within the district).

Following on from comments with respect to the above question, it is appropriate to consider the specific needs of different groups of the population, particularly the aging demographic. In this respect, a proactive approach needs to be taken to the allocation of sites within and around settlements in order to meet indigenous need.

Q1H: Draft Conclusions

The Council need to take a more progressive approach to the assessment of their objectively assessed housing need, and it is suggested that further work is required.

Draft Stage 1: Green Belt Study

Q3 (GB)

The scoring system employed in order to consider the manner in which land performs the five national purposes of the Green Belt appears reasonable though clearly this will need to be implemented in a robust and transparent fashion so there is consistency between all the sites being considered. However, given the recognition that some Green Belt land will have to be released attention needs to be given to the advice at Paragraph 85 of the NPPF, which specifically relates to defining Green Belt boundaries.



In this respect, the size of the 'General Areas' being considered has a significant bearing upon the scores that some sites achieve (such as Hillam 1) where some smaller component areas perform well with respect to the criteria identified. For instance, that land at Greenacres, south of Fryston Common Lane, immediately adjoins the settlement and represents a natural extension to it with readily definable boundaries that are likely to remain permanent going forward. It, therefore, performs well with respect to the advice at Paragraph 85 of the NPPF as well as the criteria in Table 8, whilst the wider General Area performs less robustly. As such, in order that sustainable development is achieved that respects the objectives of policies which providing an appropriate level of housing throughout the district, it is suggested that parcel sizes should be minimised or larger parcels broken into their constituent parts.

Q4 (GB): Do you have any comments in the approach to defining purpose 5 of the Green Belt review?

Purpose 5 sets out the approach to defining the extent to which Green Belt assists in urban regeneration, by encouraging the recycling of derelict and other urban land.

It is considered this approach accords with national policy, however, it is necessary to apply this flexibly on a site by site basis. In broad strategic terms, it has the potential to encourage sustainable growth through the prioritisation of regeneration of brownfield sites. However, in certain circumstances, the other four purposes should be given more weight. If applied too rigidly, Purpose 5 could prevent essential small scale growth in existing villages which do not have brownfield land available. In certain instances, Green Belt boundaries will need to be revised to include greenfield land and not just brownfield sites with the cognisance being given to that settlement's sustainability. This is particularly pertinent in Hillam 1, which is identified as a Designated Service Village, but does not benefit from reserves of brownfield land to accommodate new housing which is required to sustain the village.

Draft Methodology for the Identification of Development Limits

Q6: (DL) A – The need to identify development limits in plan Selby

Development limits have an important role in directing development to appropriate locations and maintaining the character and appearance of settlements. As such, development limits should be defined taking full cognisance of the need for development within the district and its component parts with attention being given to providing robust boundaries going forward. Ideally, readily identifiable physical features should be used that are likely to be permanent.

Q6: (DL) B – An alternative policy approach to protect the countryside

The need for an alternative policy approach may be required in the event that the objectively assessed housing need is not fully addressed and/or the housing levels should decline. If this should occur then criteria based policies may have a role in addressing the district's development requirement.

Q6: (DL) C – The proposed methodology for defining development limits



The proposed criteria are considered to be broadly appropriate, subject to an appropriate quantum of land being released.

Q6: (DL) D – The conclusions about defining 'tight' development limits

All land proposed for allocation for the purposes of development should be fully assessed and for the purposes of robustness going forward, included within the development limits. This is particularly pertinent with respect to the need to review the Green Belt, in order to provide assurances going forward. In this respect, an overly tight boundary could inhibit the provision of the housing required and the NPPF identifies the need for plans to be flexible in order that they can adapt to changing requirements going forward. In order to accord with the underlying aim of the NPPF it is apparent that the allocation of sites should be assessed on the basis of their sustainability and the potential implications to the character of the settlements within which they are located. In order to provide some flexibility going forward, and avoid the need for subsequent Green Belt reviews, some pragmatic approach should be taken with respect to the allocation of land, even if that should lead to some being safeguarded for release in the event of, for instance, a shortfall in Five Year Housing Land Supply.

Draft Method Statement for determining the status of villages in the Green Belt

Q8 (VGB) Do you have any comments on the proposed approach to determining the status of villages in the Green Belt set out in Section 3 of the Study?

Monk Fryston/Hillam is currently identified as a Designated Service Village, and excluded from the surrounding Green Belt, and clearly has a role in helping meet part of the district's housing requirement. This designation is supported but further consideration needs to be given to that land adjoining the settlement and its role in terms of Green Belt objectives, as certain land represents a ready extension to the settlement with boundaries that are readily identifiable and likely to be permanent (being one of the requirements of the NPPF, Para 85, when defining Green Belt boundaries). In this respect, further consideration should be given to the development boundaries to accommodate future growth in a robust and flexible manner.

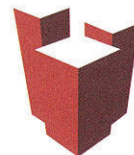
Questions on the Plan Selby Site Allocations (Draft Framework for Site Selection)

Q9 (SS) A - The overall approach to the site selection process set out in Section 6.3 of the study

As commented with respect to the analysis to Green Belt above, it is imperative that this site selection process is undertaken in a robust and consistent manner, with the merits of one site being readily and easily assessed against another, with full cognisance of a site sustainability being considered rather than it purely being ruled out on the basis of (for instance) its inclusion within the Green Belt. In this respect, due consideration also needs to be given to smaller components of the larger 'General Areas' as a number perform well when assessed against Green Belt objectives and Government's advice with respect to defining boundaries.

Conclusions

Selby District Council's consultation with respect to the draft studies and evidence base is to be applauded but it is incumbent upon the Council to ensure that its evidence base is robust so that it can objectively identify its housing need whilst providing flexibility going forward (in order to



address any change in circumstances). It is trusted that these comments will be taken into account in the production of the evidence base and I look forward to being informed of any forthcoming consultation stages.

Yours faithfully
for Signet Planning

JAMES HOBSON
Director