

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 D	etails - Please provide contact detail	s and agent details, if appointed		
	Personal Details	Agent Details (if applicable)		
Name	Mrs D Lawn	James Hobson		
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Telephone n	10.	01423 857510		
Email addre	ss	hobsonj@signetplanning.com		

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 a	and Topic area for each	comment you wish to make.
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Topic / Chapter Question no.	5 hed document for our comments on the	Paragraph	2.3		
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Topic / Chapter Question no.	(Text is limited to the available area to en		ves of the Sites and Policies Local Plan.		
Question no.					
<u> </u>		napter 3 - Key Issue:	5		
Diagram and the ettert	7a, 7b, 8, 9, 22, 24, 26	Paragraph	3,16, 3.23, 3.30, 3.113, 3.128		
Please see the attached document for our comments on the key Issues facing the Council and our specific responses with respect to: Question 7a) - The proposed approach to the base date. Question 7b) - The broad principles of the calculation method. Question 8 - The overall amount to allocate. Question 9 - Distributing the housing development between Designated Service Villages. Question 22 - Developments Limited. Question 24 - Designation of Safeguarded Land to potential future use. Question 26 - Renewable Energy.					

Comment(s)

Please ensure you	provide reference	to the Question and	Topic area fo	or each comment y	ou wish to make.
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Topic / Chapter	Chapter 4 - Development Management Policies Discussion & Review			
Question no.	31, 33a) & 33b)	Paragraph	4.8, 4.15	
-Question 31 - N -Question 33a)	attached documents for our comments on Mix of house types and sites, tenures and - Detailed Design Policies Specific Design Requirement for Allocate	specialist accommo		
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Topic / Chapter		ensure all text is visib hapter 5 - Settlemen	·	
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Additional Comme	ents - Please provide any additional comments you may wish to make.
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(1	Text is limited to the available area to ensure all text is visible. Continue on a seperate sheet if necessary)
Comment Submissi	on Statement
some personal identfy confidentially. Where	e made in an email or in writing if they are to be considered. Your comments and ying details will be published in a public register and cannot be treated practical, personal identifiers may be redacted, however Selby District Council t all identifiers will be removed prior to publication of consultation records.
Signed James	es Hobson for Signet Planning Dated 19 January 2015
Please ensu	re you save a copy of your completed comments form to your computer before sending by email
*	ed comments forms must be received by the Council
	later than 5pm on Monday 19th January 2015
	elby.gov.uk
	and Strategy Team, Selby District Council, Civic Centre, aster Road, Selby YO8 9FT

PLAN SELBY - THE SITES AND POLICIES LOCAL PLAN - INITIAL CONSULTATION COMMENTS BY SIGNET PLANNING ON BEHALF OF MRS D LAWN

Question 5 - Aims and objectives

In order to deliver the housing numbers required and ensure a continuous supply over the plan period which will meet the minimum requirements set out within the adopted Core Strategy it is necessary to review Green Belt boundaries, with priority being given to those less sensitive sites that would not prejudice the role and purpose of this designation.

For this reason the fourth objective should not be diluted but rather emphasised to ensure that this matter is addressed in a positive manner that accords with the settlement hierarchy and housing requirements identified within the Core Strategy.

Question 7a) - Proposed approach to the base date

For the purposes of consistency, and to reduce potential confusion when reviewing housing numbers going-forward, the base date should be the same as for the Core Strategy.

Whilst the Core Strategy acknowledges at Appendix C the potential need for a later start date, any amendment should be no later than 2015 (by which time the Core Strategy indicates it should be adopted) as this would lead to greater uncertainty and undermine a planned approach to addressing housing needs.

Question 7b) - The broad principles of the calculation method

The proposed discount for approved developments by 10% appears to be consistent with recent appeal decisions but the recent history of under-delivery compared to the housing requirement should be addressed by allocating additional numbers/land (as set out at Paragraph 3.19 of the Consultation Document).

Question 8 – Overall amount to allocate

The adopted Core Strategy identifies a need for a **minimum** of 450 dwellings to be delivered per annum across the Plan Period (2011 to 2027) with 33% of new allocations (a minimum of 1,780 dwellings if existing all extant planning consents come forward) being directed towards Designated Service Villages (DSV's) such as Monk Fryston.

In order to ensure as robust a position as possible with respect to housing land supply, and in the light of recent trends of under-delivery when compared to housing requirement, the plan needs to over-allocate land, and it is suggested that the buffer should be 20%.

To further ensure delivery it is suggested that a range of sites should be identified, rather than a smaller number of larger sites that have a recognised longer lead-in period. Ideally this would include a range of site sizes spread around the district, which should ensure a greater number of early starts and therefore contribution to housing figures.

Whilst contingency sites have some potential value experience shows that there needs to be a ready mechanism for (when necessary) their early release, otherwise there are delays in the release of such sites that significantly reduces their effectiveness as a potential solution to recognised housing needs. In the event that this measure should be pursued within policy it is suggested that it is directly related to five year housing land supply figures.

Question 9 - Distributing the housing development between Designated Service Villages

The plan should set out how the Designated Service Villages 'minimum' housing figure is to be achieved, and in order to do this it is necessary to consider how it will be distributed amongst the 18 villages so designated.

In this respect, due consideration should be given to the sustainability of the villages involved and the ability to integrate further development into their existing envelopes whilst minimising their impact upon the character and appearance of their surroundings. As such this should not be a percentage figure for each village but rather a critical assessment of the opportunities available and the ability of sites to come forward to meet that need.

As recognised by Government guidance, sites need to be available, deliverable and suitable to make a meaningful contribution to the Council's housing requirement, in order to provide some certainty with respect to delivery. It is in the light of this that this approach is advocated.

Question 22 – Development Limits

The Council needs to be proactive in its approach to settlement growth, particularly if it is to bring forward development that improves the economic, social and environmental conditions of the district. Unconstrained and underutilised sites within the Green Belt that are sustainable as well as attractive to the market should be identified, and it is important that development limits are not drawn so tightly that they limit necessary growth or require the undertaking of a similar exercise before the end of the plan period.

Question 24 - Designation of Safeguarded Land for potential future use

As identified above, such land may well have a role in addressing the district's housing needs and avoid an unnecessary review of Green Belt boundaries going forward (which Government wishes to avoid). However, as stated, any policy requirements associated with such a designation need to be proactive, so that housing numbers are not adversely constrained whilst such land is being released (which would inevitably lead to less sustainable sites being argued on the basis of housing need). For this reason flexibility needs to be incorporated into how such land is designated, with allocations meeting at least the minimum requirement over the plan period and safeguarded land being in addition to this.

Question 26 — Renewable Energy

Government is seeking to address such measures through Building Regulations, and avoid unnecessary duplication of standards between different regulatory instruments (it is also seeking to reduce the proliferation of different standards at the local level). Therefore, whilst the core principle of the NPPF should be emphasised there is no particular evidence that standards greater than those specified by Building Regulations are required, though clearly these have to be taken into account when designing new buildings.

Question 31 — Specifying mix of house types and sizes, tenures and specialist accommodation (such as care homes and self builds)

The findings of the forthcoming SHMA need to be addressed by policy, but policy also needs to have the flexibility to address any changes in housing demand going forward. Whilst the market is not always perfect prescriptive housing splits could be equally harmful to addressing local needs, and may not be cognisant of specific site characteristics or the state of the local market. It is, therefore, suggested that support be given to those elements where there is an acknowledged need for specialist accommodation, such as care homes, but that a prescriptive policy is not applied across the district.

Question 33a) – Detailed design policies including minimum design standards relating to, inter alia, density, environmental and quality design benchmarks (such as BREEAM, Lifetime Homes, Secure By Design etc.)

Whilst the importance of design cannot be derogated the comments made above (for Questions 26 and 31) apply equally here, with a significant proportion being addressed by revised Building Regulations.

Question 33b) – Specific design requirements for allocated sites that consider the layout, orientation and aesthetic of development proposals

It may well be that specific sites warrant a Development Brief, but it would be appropriate for this to be in addition to rather than part of the specific allocation, so that there is flexibility in how each site is approached subject to the issues identified at the time of the pertinent submission.

Question 53a) - How should Monk Fryston & Hillam grow and develop?

Monk Fryston and Hillam should expand in the same manner as to date, namely one which considers topography, visibility, and the relationship with heritage as well as other assets/consultants. Due to the size and nature of the settlements this is likely to take the form of a number of small to medium sized sites (say up to around 1.5 hectares) that integrate into the established form and layout.

In this respect, land which is associated with the settlement (rather than the countryside beyond) should be prioritised ahead of open countryside / agricultural land. That land which is enclosed by other development, be it residential or agricultural in nature, as well as existing landscape features, such as trees or mature hedgerows, should be prioritised as it will emphasise the relationship with existing built form and represent a more natural conclusion to its visual envelope. In this way the objectives of the Green Belt review will also be addressed, as physical features that enclose proposed development will lead to a sense of permanence to any future boundaries.

In this manner the growth of the villages will be achieved in a due and proper manner than ensures the existing development is not swamped by new build but rather than it represents a natural extension to it without being intrusive within the wider context. This will also assist in ensuring a viable community going forward that will also make a meaningful contribution to the housing as well as other needs that are identified in the adopted Core Strategy (which builds upon the principles set out within the NPPF). It is, therefore, in this

manner that the aspirations of Government guidance as well as Core Strategy policy will be adhered to.

[Whilst it is recognised that this consultation does not seek to address proposed allocations, instead concentrating on how to choose the best sites, reference is made in the text to the Call-for-Sites Exercise. As such, it is appropriate to draw your attention to the submissions made with respect to Land at Greenacres, Common Lane, Monk Fryston, which included:

- Planning Statement
- Masterplan Document
- Ecological Appraisal
- Landscape
- Visual Impact Assessment
- Highway Assessment
- Flood Risk Study
- Expressions of interest from housebuilding

These documents demonstrate that the site is available, suitable and achievable to help meet part of the district's housing requirement.]