

## Cheryl Atkinson

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**From:** Stokes, Ian <Ian.Stokes@york.gov.uk>  
**Sent:** 10 August 2015 16:34  
**To:** LDF  
**Cc:** Macefield, Rachel  
**Subject:** City of York Council response to Let's Talk PLAN Selby  
**Attachments:** Response to SDC Let's Talk PLAN Selby 2015 consultation\_1.doc

**Importance:** High

Dear Sirs,

Thank you for the opportunity to participate in the 'Let's Talk PLAN Selby: Summer 2015 Consultation' on Selby District Council's PLAN Selby Sites and policies local plan.

Following examination the Draft Studies and Evidence Base intended to inform PLAN Selby, City of York Council (CYC) offers both general comment on the consultation and documents overall, more detailed comment in relation to the specific questions posed in them. The general comments are set out below and the more detailed comments are contained in the attached table.

General comments are as follows:

- i. Some of the studies and evidence base raise issues that are of a strategic nature and have cross-boundary implications (e.g. Housing market area and green belt). In respect of this CYC notes with interest the following consultation responses referred to in the Selby District Market Town Study:
  - *'Must have regard for neighbouring authorities plans. Given current stage of York, Leeds and Doncaster, SDC has opportunity to consider whether it can assist any of their unmet needs or if they can meet any of SDC's unmet needs.'*
  - *'York should meet its own needs and we should not be building houses in SDC for Leeds and York.'*
  - *'Green Belt sites can only be removed under exceptional circumstances therefore no Green Belt sites should be included in PLAN Selby.'*

- ii. In view of i) above City of York Council is of the opinion that there are many issues that require further discussion between CYC and Selby District Council (SDC) both at the informal level and under the duty to cooperate. Exploring the potential for Selby District to accommodate some of the City of York's objectively assessed housing need (OAHN) is one of the main issues in this respect, as much of Selby District falls within York's housing market area and its travel to work area, and CYC would welcome further discussion on this matter. To facilitate this, a further meeting between CYC and SDC officers has been arranged for 10 September 2015, as agreed at the PLAN Selby stakeholder meeting on 30 July 2015.
- iii. Whilst the studies and emerging evidence base documents seem to be thorough and extensive, there appear to be some inaccuracies, discrepancies and inconsistencies in and between them, albeit that they are mainly minor.
- iv. With reference to iii) above the studies and evidence base would benefit from:
- A statement of status (i.e. are they intended to supersede or supplement previous evidence)
  - An order of precedence, particularly where they are setting or informing criteria based policies and allocations, and more detail on their inter-relationships.
  - Consistent content in each document relating to previous, current and emerging studies, strategies and evidence.
- v. There are some detailed comments in relation to some aspects of the various documents that are not covered by the specific questions.

For Example in the Stage 1 Green Belt Study:

- On Page 18 it is stated for York that its Green Belt Review is '*Not Identified*'. Work towards preparing a Green Belt Study has started and this will be reported to the Local plan Working Group (LPWG) as part of a series of meetings to discuss the Local Plan evidence base.
- On Page 41 the City of York Site Selection Paper Addendum (September 2014) is listed. It is important to note that this should be read in conjunction with the earlier Site Selection and Further Sites Consultation documents.
- On Page 42, Figure 2 shows the historic character and setting of York 2011 map. There is a more recent update of this available (2013) and it should also be noted that CYC is in the process of doing further work on this evidence base.

For Example in A Framework for Site Selection:

- Figure 2.1: Housing and Economic Land Availability Flow Chart – the stage 1 processes are confusing as they suggest that a call for sites/broad locations (which section 6.1.1 suggests occurred in 2013) occurs after the determination of assessment area/site size and after the desktop review of existing information. It is not clear how site assessment areas and sizes were sourced or determined prior to the call for sites process. It is also unclear how this flow diagram relates to the SHLAA and ELR documents in terms of which analysis appears where.
- CYC are keen to ensure that sites adjacent to the Selby/York boundary are assessed as reasonable alternatives as having the potential to meet either authorities objectively assessed housing need and welcome further discussions ensure all options have been considered.
- Table 3.1 identifies a potential for 5ha of employment land within designated Service Villages and Secondary villages with a focus on Eggborough and the A19 and another paragraph stipulates that additional employment space may be needed in designated service villages to support some growth in local enterprise. CYC would welcome the opportunity to explore these issues further in a detailed meeting to understand what this could mean for Escrick, York and the A19 corridor and any potential for cross boundary issues.
- Within table 4.1 it is unclear which evidence bases will actually underpin the analysis for site selection and if updates to emerging evidence base will have the opportunity to alter future site selection.
- CYC are keen to ensure that the emerging school capacity evidence listed in table 4.1 takes account of potential allocations within York and the impact this could have on school capacity where residents from both authorities attend a school such as in the case of Tadcaster Grammar.
- Figure 6.1: Critical Flow chart identifies SDC Gypsy and traveller site section occurring between June and August 2015 but does not identify any relationships between this document and others. The study does not feature in the current focused consultation period and CYC would be interested to know more about this study.

I trust you will find these useful as you progress your Plan towards Examination.

Yours sincerely,

Ian Stokes | Development Officer (Transport Strategy)  
t: 01904 551429 | e: [ian.stokes@york.gov.uk](mailto:ian.stokes@york.gov.uk)

**City of York Council** | Planning & Environmental Management |  
Directorate of City and Environmental Services  
West Offices | Station Rise | York | YO1 6GA  
[www.york.gov.uk](http://www.york.gov.uk) | [facebook.com/cityofyork](https://www.facebook.com/cityofyork) | [@CityofYork](https://twitter.com/CityofYork)

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**Q1 (SHMA) Do you have any comments on the:**

**a. the housing market areas in and around Selby?**

CYC believes that the approach to defining the geography of the housing market is thorough and its conclusions accord with the preliminary position taken by City of York Council (CYC) in its local plan evidence. (Note York has recently commissioned a SHMA update that will examine this matter from the York perspective).

**b. trend based demographic projections?**

CYC's current expectation, for the short-term at least, is to see continued out migration from York households who are priced out of the York housing market. The emerging York Local Plan will be seeking to address this, but any change in price differentials will take some considerable time to occur and effect any reduction in out migration of households from York

**c. economic led projections?**

The assumption that the current trends continue for the commuting balance with York (i.e. no policy interventions to change the commuting balance) accords with the approach being taken by Arup in their work for CYC on objectively assessed housing need (OAHN).

**d. affordable housing need?**

No Comments

**e. market signals?**

No Comments

**f. need for different types and sizes of homes?**

CYC agrees with the views expressed in the summary box on p112 in respect of households from York looking in Selby District for lower priced housing

**g. housing needs for specific groups of the population?**

CYC is carrying out some work investigating the demand for and barriers to self build homes. Officers will be pleased to brief you on the general findings of this work in September 2015.

**h. draft conclusions?**

CYC is of the opinion that further discussion between Selby District Council (SDC) and CYC will be required at the end September following receipt of the Draft SMHA for the City of York that is being prepared by G L Hearn.

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**Q2 (ELR) Do you have any comments on the:**

**a. analysis of the economy and commercial markets?**

CYC notes with interest the views of agents about the role of Escrick and the amount of commercial development that appears to be currently taking place there. This raises potential Duty to Cooperate issues as the settlement adjoins the boundary with York UA. Therefore, CYC is of the opinion that further discussion between SDC and CYC will be required.

Also, please be advised that CYC has received representations in respect of the York Local Plan Preferred Options consultation from the owners of the North Selby Mine site that adjoins Selby District. These representations argue that the site should not be included in the York green belt

**b. functional economic areas identified?**

CYC believes the analysis is inward looking and does not consider the travel to work area (TTWA) geography. Even though the most recent analysis is now dated (2001 census based) it remains a relevant consideration as it shows a strong relationship between Selby and York with a shared TTWA covering most of the two local authority areas along with parts of the East Riding and rural areas to the north of York. Furthermore, analysis of the 2011 travel to work data in the SHMA shows that the much of Selby District continues to share a TTWA with York (although it is recognised that this is not the official ONS TTWA definitions from the 2011 census as these are yet to be published).

CYC is of the opinion that further discussion between SDC and CYC on this matter will be required.

**c. availability of the sites set out in Figure 1.3 of the Executive Summary (Figure 3.4 of the main report)? (See note after Q2 (ELR) d)**

CYC has no specific comments on this assessment.

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**d. conclusions, and the basis for the conclusions, on the allocation/de-allocation of the sites set out in Figure 1.3 of the Executive (Figure 3.4 of the main report)? (Appendices 1, 2, 3a and 3b of the ELR main report set out all the sites which were assessed as part of the study, The conclusions are based on a high level assessment of supply and makes recommendations in terms of which sites should be carried forward taking into account the balancing of predicted demand and supply of employment land)**

The recommendations on the scale and distribution of employment sites to be taken forward appear reasonable and do not raise any strategic issues in respect of the relationship between Selby District and York UA. However, as set out in response to question 2a CYC will welcome further discussion on the future development of Escrick.

**e. other conclusions/findings of the study.**

No Comments

**Q3 (GB) Using the information within Table 8 of this study, do you have any comments on the approach by which General Areas could be defined as 'weakly' or 'more strongly' fulfilling the five national purposes of the Green Belt (as defined within NPPF Paragraph 80)?**

There is a discrepancy in the study as there appear to be three tables labelled as 'Table 8' (and two labelled 'Table 7') within the document. Presuming Table 8 starting on page 59 is the correct one CYC can not confirm the scores allocated to the Escrick parcels until such time as CYC's Green Belt Study has been progressed further.

**Q4 (GB) Do you have any comments on the approach to defining purpose 5 of the Green Belt Review?**

CYC can not confirm this approach until such time as CYC's Green Belt Study has been progressed further.

**Q5 (SCG): Do you have any comments on the:**

**a. principle of defining Strategic Countryside Gaps in PLAN Selby?**

The principle raises no causes for concern for CYC at the present time, as the gaps identified are remote from York UA.

**b. methodology used to assess potential Strategic Countryside Gaps?**

The methodology raises no causes for concern for CYC at the present time.

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**c. assessment of each potential SCG?**

The assessment raises no causes for concern for CYC at the present time.

**Q6 (DL) Do you have any comments on:**

**a. the need to identify development limits in PLAN Selby?**

It would appear that the Method Statement for Definition of Development Limits seeks to define settlement limits in areas outside the green belt. This is unlikely to have any significant impacts for the City of York.

**b. an alternative policy approach to protect the countryside?**

No Comments

**c. the proposed methodology for defining development limits?**

No Comments

**d. the conclusions about defining 'tight' development limits?**

No Comments

**Q7 (SL); Do you have any comments on the proposed approach to identifying safeguarded land set out in section 3 of the study?**

The overall approach appears to be quite thorough with a useful analysis of the uncertainties in the NPPF in respect of the need to identify safeguarded land.

One matter which is not explicitly addressed is the interaction between the 'where necessary' test in paragraph 85 and the policy on reviewing green belt that is set out in paragraph 84. This policy states: -

*When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary*

There are substantive areas within Selby District that lie beyond the outer edges of both the West Yorkshire and the York UA green belts. Consequently, one option for longer term development would be to direct it to sustainable locations beyond the outer edge of the green belt. Such an approach could lead to there not being a need to identify further safeguarded land.



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**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?**

The approach seems reasonable and CYC will seek to engage with SDC to discuss how a similar methodology might be applied in the York Unitary Authority.

**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?**

City of York agrees with the principle of a staged approach to site selection as set out in section 6.3 of the SDC's "A Framework for Site Selection". Taking a staged approach which considers potential residential, employment and retail use for all sites and considers site constraints, quantitative and qualitative assessment as well as deliverability assumptions broadly concurs with the approach taken by York but with a few key differences.

**Stage 1 – Initial Sift** – The listing of fundamental constraints supported by NPPF such as Flood Risk Zone 3b, International and National Environmental Designations, Ancient Woodland and Heritage Assets is again in line with the approach City of York have taken in respect of protecting areas of "Primary Constraint" through the CYC Site Selection Paper Methodology and Spatial Strategy. The methodologies of the two authorities also align in that they both use criteria to identify sites which align with the spatial strategy of their respective plans; however the two authorities have fundamentally different approaches to spatial strategy.

The additional factors included within the SDC's stage 1 initial sift, which differ to those CYC have covered, evaluate a sites compatibility within SDC's Core Strategy Settlement Hierarchy, and the proximity of a potential site to an existing settlement as a primary sieve. This differs in a number of ways from CYCs approach as CYC do not have an adopted Core Strategy settlement hierarchy or an adopted greenbelt at this time.

The SDC approach takes sites which best fit with the settlement hierarchy and considers their suitability/sustainability and then their deliverability/willing landowner status. Should there not be sufficient sites with a willing landowner/available within the settlement hierarchy this would then trigger the second stage of a greenbelt review to evaluate the release of the weakest areas of the greenbelt as potential growth options in preference to evaluating other areas outside of the greenbelt which may have a willing landowner. This varies from CYC's approach which has tried to embed a willing landowner at the core of its evaluations to prioritise the reliable deliverability of sites to meet housing need and then use general sustainability criteria to select which of these sites is the most suitable and can support a sustainable pattern of development regardless of a settlement hierarchy or

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greenbelt boundary. CYC's greenbelt study will then evaluate the potential allocations for suitability against the 5 purposes of greenbelt.

In respect to SDC proposing to sieve out sites which are not in proximity to a settlement the point is added that this "may include sites what are detached from the built form by a small field boundary or open space" is makes this criteria a more arbitrary primary sieve which could be subject to challenge and perhaps a maximum potential distance would be more suitable.

**Stage 2 – Quantitative Assessment** - The themes chosen by SDC in this stage broadly agree with those included within York's site selection methodology.

In respect of nationally and internationally protected nature conservation designations we would argue that a quantitative assessment could note the proximity of sites to these assets but would be unlikely to meaningfully assess the impact of a site upon them as this would need a consideration of potential mitigation and would be a more qualitative assessment.

York will be interested to learn more on how SDCs proposed approach to apply the flood risk sequential test to settlements within its hierarchy rather than individual sites progresses. We would like to understand more on if this will impact on the settlement hierarchy and the draft growth options for designated service villages as this is not clear.

SDC's approach to measuring access to services from the centre of a site differs from York's approach that access can be measured from any part of the site..

It is unclear how the outcomes of stage 2 are assessed. The assessments of criteria appear to be graded on traffic lights with '+' and '-' scores similar to a Sustainability Matrix but it is not explained as to if a single red score or '-' would constitute a fail or if a cumulative decision on the relative merits of the site will be made.

There is further confusion produced by two conflicting statements in this section of the document - "All sites will be passed through to stage 3" and the next sentence states that the "sites that 'pass' this stage will be fed into the sustainability appraisal". If there is potential for sites to fail in terms of their ability to form a reasonable alternative for SA evaluation then presumably these should not be fed into the next stage of the site selection framework. CYCs approach is to assess all sites which pass quantitative or accessibility scoring as Sustainability Appraisal reasonable alternatives based on numerical scores which allow the relative merits to be compared and include a threshold value.

**Stage 3 – Qualitative Assessment** The themes chosen by SDC in this stage

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broadly agree with those included within York's site selection methodology. For CYC however 'physical point of access' or the ability to provide one, forms part of the *quantitative* assessment and failure to be able to provide this would contribute to ruling the site out of being a reasonable alternative.

Looking at the extract from the proposed stage 3 methodology, it appears that SDC are also intending to use an SA style assessment matrix for the potential qualitative analysis. This style makes it clear as to the potential level of impact on an identified point/topic but does not answer the questions posed in the "question" section of the table. While it assesses that there may be a significant adverse impact on heritage assets, nowhere does it answer what type of asset will be impacted upon (conservation area/listed building/SAM etc) or the name of the asset. The table layout also does not allow for an explanation as to how the amount of benefit or harm has been evaluated. Where any potential for harm is identified there is always an opportunity for mitigation, and in turn this potential mitigation requires further assessment.

It is not clear if sites are ruled out at stage 3 for having any negative impact at all or if some form of cumulative impact is assessed.

**Stage 4 - Deliverability** - CYC Site Selection does consider deliverability to the extent that all sites considered through the current process have been submitted at 2012 or later as a confirmed willing landowner in line with NPPF requirements and further work on the current availability and timeframes is carried out through the CYC SHLAA/ELR Retail study methodologies as these are documents which take account of market suitability, lead in times and delivery rates.

For CYC, viability of sites is assessed through a separate viability assessment evidence base which takes into account all potential policy cost implications.

The assessment of traffic impacts within CYC (in a cumulative sense) is also considered through a separate city wide transport investment requirements infrastructure study.

**b. The details of the site assessment work proposed in Appendix A of the study?**

**Stage 2 Quantitative**

It is unclear for the topics other than "accessibility by public transport" and "cycling" which topics are considered in the analysis of housing or employment/retail or if all are relevant to both types of development.

**Accessibility by public transport (For housing)**– This should perhaps be redefined as accessibility to *employment locations* through public transport as this

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appears to be the aim of the criteria. When assessing this criterion CYC's site selection methodology assess walking distance to high frequency bus routes, focusing more on the accessibility and reliability of transport service without the dependency on the final destination of that route. Reducing the dependency on car travel for getting to and from work is only one aspect of access to public transport provision.

It is noted that the SDC methodology only scores public transport which links to major centres offering 8000+ jobs (which we note does include York) and Intermediate locations offering 3000-6000 jobs (within the Selby area only). Our questions around this are –

- Which evidence base document identifies these destinations and designations?
- What happens to centres between 6000 and 8000 jobs?
- Are potential new employment destinations and planning consents considered within this?
- There is some conflict with the 'proximity to employment centre' criteria considered later in the list which also considers smaller employment locations of 800-1000 jobs and their accessibility. Is not accessibility to any employment locations (regardless of size) a positive?
- Has any assessment been done as to potential employment destinations outside SDC boundary? For example to the south of York lie the Designer Outlet, the University of York, Elvington Industrial Estate and Wheldrake Industrial Estate.
- When identifying Major Centres of York and Selby is the public transport accessibility measured to the city centre, the edge of the urban area or to known employment locations within the cities ? (in York for example – the city centre/the University/the science park/ CPP offices/Heworth Green.
- The thresholds of 30, 45 and 60minutes travel to work time are identified but it is unclear what the evidence base for this is.

Sugar Access is identified as the mechanism for identifying these travel to work times, while CYC considered using similar software it was decided that using average geographical distances of 400 and 800m from routes gave a more comparable and easier to update and understand baseline for analysis in terms of potential access to established public transport routes.

**Accessibility by public transport (For non housing)**– Unclear how the threshold populations within specified travel times have been decided – has there been a piece of work to determine what approximate population is required to support an employment location? Does the relative size of the proposed allocation not also need to be considered? Does the population considered take account of proposed/potential or planned new housing? If not, is it possible that the opportunity for the creation of new sustainable locations where new housing and

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employment destinations are co-located being overlooked.

**Accessibility by Cycling (For housing)**– This should perhaps be redefined as accessibility to *employment locations* through cycling. It is acknowledged that the former PPG13 suggests the distance of 5km as having the potential to substitute car trips for cycling but it is less clear how the distances of 1.2km and 3.6km have been decided. Varying the scores attributed by both cycling distance and population included within that distance for housing is inconsistent with evaluation of the same criteria for employment (discussed next) which uses a standard 5km buffer to only varying population size within that distance in terms of generating more preferential scored. The proposed methodology again only considers major and intermediate employment destinations, the same questions raised in accessibility to public transport in respect to potential employment destinations also apply to this topic. It is thought this topic perhaps tries to summarise too many variables which need to be considered separately.

There is inconsistency created by using travel times for the analysis of public transport and using distances for cycle accessibility. There is further inconsistency in using metric distances for some topics and imperial ones for others.

CYC's approach to accessibility by cycling has been to assess the accessibility of a site in terms of 5, 10 and 15 minutes cycle time to a train station and if there is access to a designated cycle route within a 2 minute cycle time of the site (530m). CYC prioritise access to dedicated cycle routes as the way of prioritising the safety and convenience for this type of travel.

**Accessibility by Cycling (For non housing)**– It is unclear how the population thresholds within specified distances have been determined. It is inconsistent to use a metric measurement distance for application to cycling time (5km) when a travel time value has been applied to public transport and an imperial measurement distance (5miles) has been applied to proximity to employment in a later topic. No consideration is given to dedicated cycle routes ensuring cycle safety.

**Proximity of primary school** – The data source listed for this topic states that the Urban Potential Studies and the Sustainable Settlement Guide (UWE/LGB, 1998) identified distances between 400 and 800m as easy walking distances (this is also in line with the approach taken to accessibility by CYC site selection paper) so it is unclear why 1200m has been used by SDC as the baseline travel distance for two of the assessment criterion. Sugar Access has been identified by SDC as the mechanism for determining the 1200m accessibility isochrones. Again CYC have used standard 400 and 800m buffered distances from the school rather than accession software. The SDC scoring matrix from this topic has positive and neutral scores but no negative score for lack of access to a primary school, does this mean a site does not require access to a primary school to be considered suitable.

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**Proximity of GP Surgery** – If distances between 400 and 800m as easy walking distances have been identified it is unclear why 1200m has been used as the baseline travel distance for two of the assessment criterion. Sugar Access has been identified as the mechanism for determining this distance. Again CYC have used standard 400 and 800m buffered distances rather than accession software. There are positive and a neutral scores available for this topic but no negative score for lack of access to a GP Surgery, does this mean a site does not require access to a GP to be considered suitable.

**Proximity to a convenience store** – Not clear on if the definition of convenience store covers individual units such as butchers/bakers/fishmongers or only general convenience? Does it also cover larger supermarkets? Is there consideration to the combination of smaller convenience provision such as a town centre or village centre which comprises a variety of convenience provision? If distances between 400 and 800m as easy walking distances have been identified it is unclear why 1200m has been used as the baseline travel distance for two of the assessment criterion. Sugar Access has been identified as the mechanism for determining this distance. Again CYC have used standard 400 and 800m distances rather than accession software and have taken an approach which considers both general convenience accessibility and proximity to a retail parade which includes convenience provision. SDC methodology offers positive and neutral scores for this topic but no negative score for lack of access to a Convenience store; does this mean a site does not require access to a convenience store to be considered suitable?

**Proximity to Employment Centre** – There appears to be significant overlaps and conflict between this analysis and the accessibility by public transport and cycling topics given that they are both looking at connectivity to housing sites. As one topic assesses by travel time and another by distance it could be possible for a site to achieve both a double positive and a minus score for the same location on a similar topic. There is inconsistency in using distance for these criteria when travel time is used for the earlier ones and also in using imperial measurements when metric ones have been used earlier – what time does 5 miles travel correlate to? It seems illogical to score a negative value for a site being within 5 miles of a smaller employment site – surely this is still a positive factor? Does this criterion take account of planned new employment?

**Agricultural Land** – York have not been able to score their site selection in this way given the generally high quality of agricultural land across the whole authority boundary but would concur that the loss of non agricultural is preferable to the loss of higher grades where possible however we note that the methodology does not differentiate between grade 3a and 3b.

**Greenfield and previously developed land** - As one of the criterion for this

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topic is to determine if the site is "suitable" Greenfield land within the settlement we would argue that this is a subjective decision or based upon the outcomes of the analysis and is therefore a qualitative criteria?. Within the proposed table extensions to settlements receives a negative score regardless of Greenfield/previously developed land status – would argue that this is contrary to policies for urban regeneration.

**Flood Risk** – There appears to be some conflict, as other parts of the wider site selection framework document, suggests options are being pursued to apply the flood risk sequential test more strategically, rather than on a site by site basis which would then overlap with including criteria on the topic in this analysis. While Flood Risk in terms of SFRA flood zone can be considered a factual and qualitative value it is likely that a site will not fall entirely within one zone alone which could make current scoring difficult to apply. In addition it is sometimes possible to apply mitigation and strategic site design to maximise a sites potential without causing an increase to levels of flood risk and therefore this topic might fit better within the qualitative analysis section. Finally the criteria appear to be ranked the wrong way around for the scoring mechanism with areas of lowest flood risk (zone 1) receiving the most negative score – we assume this is a typing error?

**Physical/Infrastructure constraints/permanent features or legal constraints?** – This is again a more qualitative than quantitative issue given the topic is posed as a question, the source is Developer/Officer knowledge and that the potential for mitigation is mentioned as a consideration in the ranking of a site. The ability to assess this point is made more difficult by the combining of the amount of site covered by constraint and the ability to mitigate it – there is no score for if only a small part of the site is constrained but this constraint is insurmountable or if the entire site is constrained but is easy to mitigate. It is also unclear why constraints which have the potential to be mitigated score more negatively than major constraints which are difficult to overcome.

**Impact on nationally and internationally protected sites (SSSI, SAC, SPA)**  
– The term "impact" implies this is a subject analysis of criteria. Distance from an important environmental asset can be quantitatively measured but should not be a reason or consideration for Failing or ruling out a site from being a reasonable alternative without further consideration of the qualitative impacts.

### **Stage 3 Qualitative Assessment**

The themes chosen by SDC in this stage broadly agree with those included within York's site selection methodology. For CYC however physical point of access or the ability to provide one forms part of the quantitative assessment and failure to be able to provide this would rule the site out of being a reasonable alternative.

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In some of the criteria being assessed CYC have found that assessment has been dependent on the level of detail/masterplanning work submitted for consideration in relation to assessing potential impacts on heritage assets, landscape character , landscape capacity etc. In many instances when developers understand the constraints and issues which face a site they wish alternative plans with enhanced mitigation to be assessed and for this reason York would advise SDC that this stage of site selection needs to be iterative and involve detailed consultation.

**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 Escrick appears to contain an error, as under the Population' sub-heading, reference is made to the number of households in Church Fenton, rather than Escrick.

There does not appear to be any statement in the document (or any of the other emerging evidence base documents) to indicate to the reader whether it is intended that SDC's Emerging Evidence Base, of which the Growth Options for Designated Service Villages forms a part, will supersede or augment the evidence base to support the Core Strategy (2013)? Whatever the intention is, CYC suggests that a clear statement of this needs to be made in the Site Allocations: A Framework for Site Selection evidence base document emerging alongside the Growth Options for Designated Service Villages to ensure allocations are not determined on out-of-date evidence. A similar statement should also be included within all of the other emerging evidence base documents.

In all other respects the Settlement Profile for Escrick appears to be correct (subject to the completion of the abovementioned evidence update in Q10)

**Q11 (DSV): If you had the choice, let us know which option for growth of the Designated Service Villages you would choose?**



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With regard to the 3 Engagement options put forward:

- The Selby Strategic Housing Market Assessment, 2015, shows Escrick to be within the York housing market area. However, none of the options appear to include for any new dwellings to realise the housing growth needs of neighbouring authorities (including York).
- The options appear to show housing need, but not housing supply
- Options 1 and 2 may result in development in areas washed over by York's green belt which extends beyond the City of York UA boundary in this area into SDC's area boundary. As the greenbelt status of land surrounding Escrick is in part determined by SDC and in part determined by CYC and therefore falls within the scope of both authorities greenbelt review's this should be taken into consideration when determining the level of growth for Escrick and we would ask for further discussion on this issue.
- Option 3 may or may not be in conflict with proposed allocations within City of York's Local Plan which has consulted on the potential to allocate or safeguard land adjoining the settlement boundary to the North of Escrick. Furthermore, as the greenbelt boundary to the North of the village of Escrick has yet to be determined and adopted though CYC Greenbelt Study and Local Plan process, it is not appropriate at this time to rule-out Escrick under this option without further work by CYC to establish the most robust greenbelt boundary for the North of the village and hence whether it has any potential to incorporate some of the objectively assessed housing need of both Selby District and York Unitary Authority .

Currently CYC's officers are working with technical experts to revise the objectively assessed housing need (OAHN) for York, following:

- A motion at Full Council in October 2014 to look further at the OAHN regarding both housing demand and the supply to meet that demand;
- the release of CLG National Household Projections in February 2015, and
- the agreement between the Council's Conservative and Liberal Democrat Groups, to establish a joint administration for City of York Council from 21 May 2015 and its top priority in its 12Point Plan stating that *"We will prepare an evidence based Local Plan which delivers much needed housing whilst focusing development on brownfield land and taking all practical steps to protect the green belt and the character of York"*.

Therefore, until such time as the ongoing technical work is completed, City of York Council is not in a position to express a preference for any of the three options put forward.

CYC is of the opinion that further discussion between Selby District Council (SDC) and CYC will be required with regard to development in Escrick.

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**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**

Consideration should be given to Escrick's position within the Selby housing market area and within the York housing market area when determining the level of growth for Escrick.

**Q13 (DSV): What areas of open land in and around your village do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where this land is and its extent. If possible submit a map to us showing the area(s) you have picked out)**

No comments

**Q14 (DSV): What parts of the built up area of your village do you think are especially valuable and tell us why you think so? (Please describe as clearly as possible where these areas are and their extent. If possible submit a map or photographs showing the areas you have picked out).**

No comments.

**Q15 (MTS): Is there any relevant evidence base missing from the baseline review and factsheets and is there anything incorrect about our summaries of the evidence? (Please note we are in the process of updating our evidence on matters such as flood risk, landscape and green infrastructure)**

The Leeds City Region Enterprise Partnership Strategic Economic Plan 2014 is missing from Sub Regional Policies and Strategies.

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**Q16 (MTS) Looking at the factsheets for **Sherburn in Elmet** which talk about the growth and regeneration of the town, do you have any comments on**

**a. the 'deficits, needs and aspirations'?**

There appears to be a potential conflict between availability of car parking and traffic congestion. Increasing the availability of parking, especially if it is to be cheap (or free) could exacerbate congestion, and thereby further harm the quality of the town centre environment, if more people are encouraged to drive there.

**b. the technical issues?**

See response to Q16 a)

**c. the options and key planning issues?**

Town Centre Initiatives

- The Council agrees that 'High quality public realm is essential in creating an attractive town centre and thus increasing dwell time and enhances the character of the towns and therefore promotes their Unique Selling Point'
- Should SDC decide to review its car parking regime in Selby, the Council suggests this takes into account wider access issues and reiterates its concerns regarding the introduction of cheaper (or free) parking raised in response to Q16 a)

**d. what areas of open land, in and around the town, do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where this land is and its extent. If possible submit a map to us showing the area(s) you have picked out)**

No Comments

**e. what parts of the town's built up area do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where these areas are and their extent. If possible submit a map or photographs showing the areas you have picked out)**

No Comments

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**Q17 (MTS) Looking at the factsheets for **Selby** which talk about the growth and regeneration of the town do you have any comments on**

**a. the 'deficits, needs and aspirations'?**

CYC is in general agreement with the following statement in the Summary of key issues relevant to Market Towns Study and PLAN Selby arising from the Baseline Report: Selby District Council Selby Retail and Leisure Study (RLS) '*Any quantitative (physical) expansion of the retail offer in the town should be balanced with a strategy which seeks to qualitatively distinguish the centre from higher order retail locations by emphasising its Unique Selling Points with an emphasis on the local independent offer, quality of place and non-retail offer, distinctive heritage assets and provide an attractive shopping and leisure experience which the internet is unable to match. A vital component of this will be making town centers as accessible as possible, with improved and cheaper car parking.*' However, CYC has doubts that cheaper car parking would improve access, as there is no conclusive evidence (either locally or nationally) that cheaper (or free) parking has improved or will improve footfall in town centres. Moreover cheaper (or free) car parking could cause harm to the quality of place (through increased noise, pollution and severance. Improving access to town centres should encompass all modes (e.g. walking, cycling and public transport as well as private motorised vehicles).

**b. the technical issues?**

See Response to Q17 a)

**c. the options and key planning issues?**

CYC notes the following from the Summary of key issues relevant to Market Towns Study and PLAN Selby arising from the Baseline Review: Summary of Representations to PLAN Selby initial consultation Document, January 2015::

- *'Must have regard for neighbouring authorities plans. Given current stage of York, Leeds and Doncaster, **SDC has opportunity to consider whether it can assist any of their unmet needs or if they can meet any of SDC's unmet needs.***
- *'**York should meet its own needs and we should not be building houses in SDC for Leeds and York.***
- *'Green Belt sites can only be removed under exceptional circumstances therefore **no Green Belt sites should be included in PLAN Selby.***
- *'The majority of other respondents **recognised the need to identify safeguarded land to meet development needs beyond the plan period and to ensure that Green Belt boundaries do not need reviewing in the next plan period in accordance with the NPPF.***
- *Once further evidence is undertaken to inform emerging policies and allocations through the on-going PLAN Selby preparation process **there will be topics where cross boundary impacts may become apparent and thus the duty to cooperate may well be triggered.***

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The City of York Council is therefore, keen to cooperate with Selby District Council as PLAN Selby is progressed, with particular regard to the abovementioned issues, as much of Selby District lies within the City of York housing market area.

With regard to the other emerging evidence base documents referred to in Market Town Study, the Council will submit separate responses to each of the consultation questions associated with these emerging evidence base documents. These will need to be read in conjunction with the response to the Market Town Study.

**d. what areas of open land, in and around the town, do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where this land is and its extent. If possible submit a map to us showing the area(s) you have picked out)**

No Comments

**e. what parts of the town's built up area do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where these areas are and their extent. If possible submit a map or photographs showing the areas you have picked out).**

No Comments

**Q18 (MTS) Looking at the factsheets for **Tadcaster** which talk about the growth and regeneration of the town do you have any comments on**

**a. the 'deficits, needs and aspirations'?**

No Comments

**b. the technical issues?**

No Comments

**c. the options and key planning issues?**

No Comments

**d. what areas of open land, in and around the town, do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where this land is and its extent. If possible submit a map to us showing the area(s) you have picked out)**

No Comments

**e. what parts of the town's built up area do you think are especially valuable and tell us why you think so? (please describe as clearly as possible where these areas are and their extent. If possible submit a map or photographs showing the areas you have picked out)**

No Comments

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**Q19 (HA): Do you have any comments on the highway assessment**

- i) The Junction identified as Junction 1 is not the junction with the A19 and the B1222. The B1222 passes to the west of Escrick and joins with the A19 just to the south of Fulford within the York Unitary Authority area. Junction 1 should be correctly identified as 'Junction 1: A19/Cawood Road (Cawood Road connects the B1222 with the A19 just south of Escrick).
- ii) Section 5.0 - Is the committed development only that for Selby or does it include the committed development for other authorities? For example, Junction 1: A19/B1222 (south of Escrick, but also see i) above) could experience higher flows if traffic on the A19 arising from City of York's committed development is included.
- iii) The Baseline two way traffic-flows on the A19 north of Junction (derived from the turning counts at Junction 1) are not significantly different to those assumed in City of York's Strategic Transport Model.
- iv) City of York Council is very much interested in the output from Part C of the Highways Assessment that is intended to identify impacts on the Strategic Road Network (in this instance the A64) and on highways within the York authority area, primarily the A19, particularly if it:
  - leads to mitigation that requires cross-boundary cooperation to implement
  - affects potential land use allocations within either the York Local Plan or the Selby Local Plan (or both)
- v) City of York Council is willing to liaise with Selby District Council and its appointed consultancy services provider as the remaining parts of the Highways Assessment (Parts B to D) are progressed.

**Q20 (HA): Are there any other junctions that should be assessed in addition to those identified in this study?**

CYC has no suggestions for further Junctions to be modelled. However, it would be of benefit to CYC to have contemporary traffic flow data on the B1222 north of Escrick if SDC either has this information available or is intending to obtain such through further surveys.