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Civic Centre,
Doncaster Road,
SELBY
North Yorkshire
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Our Ref: HD/P5342/03

Your Ref:

Telephone: 01904 601977

03 August 2015

Dear Sirs,

Selby Local Plan – Sites and Policies Local Plan – Focussed Engagement

Thank you for consulting Historic England about the latest consultation on the Selby Local Plan. We have the following comments to make in response to the questions posed in the consultation documents:-

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)?

In terms of the role which the Selby part of the York Green Belt plays in safeguarding the special historic character and setting of the historic City, we would endorse the approach that has been taken towards evaluating the degree to which the General Areas of Selby fulfill that particular Green Belt purpose. We would also agree with the Report’s assessments about the extent to which each of those Areas fulfills that purpose.

Q6 (DL) Do you have any comments on:

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

We would support a continuation of the previous Plan’s use of Development Limits. These make clear to all concerned with the planning process where development will, and will not, be acceptable.

b. the proposed methodology for defining development limits?

We support the approach which it is intended to use to define Development Limits. We especially welcome the proposal to exclude Scheduled Monuments, village

greens and other pockets of amenity land. This will help to safeguard areas which contribute to the distinctive character of the settlements within the plan area.

d. the conclusions about defining ‘tight’ development limits?

We welcome the intention to define tight Development Limits. Loosely defined Development Limits could lead to pressure for intensification of development at the rear of properties which could harm the character of many of the District’s rural settlements and undermine their landscape setting.

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?

The NPPF requires Local Plans, as a whole, to set out a positive strategy for the conservation and enjoyment of the historic environment. This means ensuring that the sites which it is proposing to put forward for development will assist in delivering such a strategy and not contradict it. In terms of the historic environment, we would broadly endorse the approach to site selection. However, consideration should be given to the following:-

Stage 1: Initial Sift – The NPPF makes it clear that “great weight” should be given to the conservation of designated heritage assets. The more important the asset, the greater the weight should be. Scheduled Monuments, Registered Battlefields and Grade I and II* Historic Parks and Gardens are identified as by the Government as being of the highest significance where substantial harm or loss should be wholly exceptional. As a result, the proposal to exclude sites which would impact upon designated heritage assets of this importance at the Initial Sift seems, on the face of it, an approach which would be consistent the Government’s Core Planning Principle for the historic environment. However:-

- (a) It is not clear why such sites are only excluded if “*the majority of the site*” is within such an asset. Any encroachment in or onto such assets could be incompatible with their conservation (and therefore in conflict with the NPPF).
- (b) Three of the categories of designated heritage asset which Stage 1 would sift out are those identified in Paragraph 132 as being of the highest significance. However, only Grade I and II* Historic Parks and Gardens fall into that category. Consequently, for consistency, it would be preferable to only include those two Grades of designed landscape.

However, as both the Historic Parks and Gardens in the District are Grade II, this is somewhat academic. Consequently, it is suggested that Historic Parks and Gardens are not included as one of the considerations of the Initial Sift.

Consequently, it is suggested that the 7th bullet-point of Stage 1 is amended to read:-

“If the site is within a Scheduled Monument or Registered Battlefield it will be excluded. The impact of development upon other designated heritage assets will be considered later in the process, as it is not considered to be a reason for exclusion at this stage”

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

Stage 3: Qualitative Assessment – Whilst we would broadly support the approach set out, the Section on Heritage Assets would benefit from a slight revision to more closely reflect the approach in the NPPF. It is suggested that the section dealing with Heritage Assets in Table A1 is amended as follows:-

Question – Is the development likely to have an impact upon an element which contributes to the significance of a designated heritage asset?

(+) – The development is likely to enhance or better reveal the significance of a heritage asset

(0) – The development is unlikely to have an impact upon a heritage asset

(-) – The development of this area is likely to result in harm to elements which contribute to the significance of a designated heritage asset

(--) – The development of this area is likely to result in substantial harm to elements which contribute to the significance of a designated heritage asset.

We welcome the intention that the evaluation will be undertaken by a heritage expert. Historic England would be pleased to assist the Authority in undertaking this evaluation.

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?

General comments

- This Section provides a good evaluation of the heritage assets in and around the Designated Service Villages. We particularly welcome the identification of key non-designated heritage assets such as the unregistered Historic Park and Gardens at Carlton and Escrick. These areas make an important contribution to the setting of the principal buildings around which they have been created.
- Where relevant, the Settlement Profile should make it clear whether the historic parks referred to are on the National List (compiled by Historic England) or are locally designated.
- There are some inconsistencies between the evaluations in terms of how they deal with Grade II Listed Buildings. Some (such as South Milford for example) make reference to the number of Grade II Listed Buildings in the settlement. Many others make no reference at all. Given that all Grades of Listed Building are considered to be of national importance, the Settlement Profiles should include the number of Grade II Listed Buildings in each village
- It should be noted that, for many of the Conservation Areas, views into and out of the designated area is a key component of their significance. As a result, before allocating any sites on the edge of a Conservation Area, there would need to be some assessment of whether or not those sites contribute to the character of the Conservation Area and what impact their loss and subsequent development might have upon that character.
- Whilst Selby has one of the lowest densities, and overall totals, of designated assets in the Region, there are known to be significant (currently undesignated) archaeological remains along both the Southern Magnesian Limestone Ridge and within the Humberhead Levels;

Detailed comments

We have the following comments to make regarding the evaluations set out in Appendix B:-

Appleton Roebuck

- It should be mentioned that the village lies less than 1km from the edge of the Grade II Historic Park and Garden at Nun Appleton Hall (although the woodland belt does limit indivisibility between the settlement and the designed landscape)

Cawood

- It should be mentioned that the northern end of the village lies only 1.3km from the edge of the Grade II Historic Park and Garden at Nun Appleton Hall

Eggborough and Whitley

- The Scheduled Monument to the east of Whitley lies only 450 metres from the edge of the built-up area. This could be an important factor in terms of identifying suitable sites for housing on that side of the village.

Escrick

- The extent of the designed landscape around Escrick Hall is a lot larger than shown on Figure 2, its boundaries being broadly coincident with those of the Conservation Area.
- The text might note that the Conservation Area includes the designed landscape around Escrick Hall

Hambleton

- Neither Historic OS mapping nor aerial photographs indicate the existence of a designed landscape to the west of the village in the position shown on Figure 1. However, there does appear to be a designed landscape around the Grade II* Garforth Hall just to the south of Hambleton.

Kellington

- It should be noted that the Church of St Edmund which lies less than 300 metres from the western edge of the built-up area is a Grade I Listed Building.

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

We would broadly concur with the conclusions set out in Section 7 regarding the likely pros and cons of each of the Options. It is clear that, even for Option 2 which is likely to have fewest negative effects, all of them have unpredictable impacts upon the environmental assets of the District. Consequently, we do not consider that any of the Options as currently set out should be pursued.

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?

In order to determine the precise scale of development which should take place in each settlement, the Council should consider an approach based upon combining Option 2 with an evaluation of the ability of each settlement to accommodate further growth

without harm to its character or landscape setting. The Core Strategy recognizes the importance of a high-quality environment to the character of Selby, to its economic well-being and to the quality of life of its communities. Therefore, it is essential that the character of the District's villages (of which its historic environment is a significant component) are not compromised through inappropriate levels of housing and employment growth.

If the plan is to deliver a truly sustainable strategy for the District, this means adopting a strategy for housing and employment growth which safeguards the irreplaceable elements of its built and natural environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

Ian Smith

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