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25173/A5/SG/jc

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Dear Sirs

PLAN SELBY
FURTHER CONSULTATION

We write on behalf of our Client, Glade Developments, in response to the public consultation which is currently taking place on the above Development Plan Document, and its evidence base.

Our Client welcomes the opportunity to engage in the ongoing preparation of PLAN Selby and its evidence base (where applicable), and trust that these comments will be afforded full and proper consideration by Selby Council as part of the ongoing plan-making process.

Our Client currently controls land interests in Eggborough, a Designated Service Village ("DSV") in the adopted Selby Core Strategy and a sustainable location for housing growth. Eggborough has access to a range of services, facilities and employment opportunities within the village and surrounding areas. The settlement benefits from including good public transport links to surrounding settlements by rail and bus. Unlike many settlements in Selby District, Eggborough is not constrained by flood risk as identified on the Environment Agency ("EA") flood maps, nor large areas of Green Belt.

Accordingly, it is essential that the Council's Sites and Policies Local Plan facilitates housing growth in Eggborough in view of its role as one of only two DSV's in the Southern Sub-Area of Selby. Eggborough is a sustainable location for open market and affordable housing delivery and its function and vitality as a Designated Service Village must be maintained through the development of housing that is capably of at least meeting the needs of the current population. However, in view of the economic and social benefits that growth can deliver, the Council's aim should be to provide a level of growth that enhances the sustainability of the settlement and improves its function in meeting the day-to-day needs of the population.

Policies contained within the Sites and Policies Local Plan and other Development Plan Documents and Supplementary Planning Documents should support and facilitate new development, and not place an unnecessary burden upon it.

PLAN Selby

We note that the Council has published a number of consultation documents as part of its evidence base. Those to which we choose to make comment comprise the following:

- Draft Strategic Housing Market Assessment;

- Draft Method Statement for identifying Development Limits, and Site Allocations: A Framework for Site Selection; and
- Draft Growth Options for Designated Service Villages.

We address each in turn below, responding to the questions raised by the Council where relevant.

Draft Strategic Housing Market Assessment (Q1 SHMA)

Question A - The housing market areas in and around Selby?

We support the identification of the Strategic Housing Market Area for Selby and consider it to be reflective of the housing market which influences housing needs within the Selby District. The predominantly rural housing market area clearly takes influence from, but can be separated from the Housing Market Areas of York, Doncaster and Leeds.

Notwithstanding the above, these representations later make comment that the nature of the District's housing market is difficult to assess in terms of trying to establish an overall view. The housing market area is imbalanced between the Principal Town of Selby and Local Service Centres at Tadcaster and Sherburn in Elmet on one side of the housing market, and the DSVs and rural areas on the other. The differing needs and market characteristics of these areas are not distinguished within the SHMA.

The SHMA's principal purpose is to identify the overall housing and market needs for the Housing Market Area as a whole. In terms of meeting the District's needs principally within the more urban areas, we consider this to be an acceptable approach. However, we feel that the SHMA is lacking in terms of identifying the needs and market requirements of the rural area, in particular the DSVs. Whilst these areas will need to play a role in meeting the District wide needs of the areas, a more important role for development in these areas is to maintain and enhance the function and vitality of the rural centres. In this sense, it is important to establish what each settlement needs in terms of growth, rather than to what extent the District's overall growth requirement can be met within them. The latter does not represent a positive approach to planning for sustainable development and is not supported by our client.

The above should be addressed with a bottom-up approach to planning for development in the DSVs, and should be included within the SHMA itself or at the very least cross-referenced within the SHMA if dealt with elsewhere in the Council's evidence base.

Question B - Trend based demographic projections?

We support the use of 2012-based Sub-National Population Projections (SNPP) which indicates population growth of 16% in Selby District over the 2014-37 period; this is significantly above projected growth across North Yorkshire (6%) and the Yorkshire/Humber Region (10%) and England (15%). The 2012-based Household Projections, based on the SNPP, project a need for an average of 343 dwellings per annum over the 2014-37 period. A higher need is shown if the analysis focuses on the period to 2027 – 383 dwellings per annum. Generally, the Household Projections also show that household formation rates are rising, quicker than have been previously projected.

Whilst we do not question the robustness of the above projections, the SHMA points towards housing needs from population growth as being less than the extant Core Strategy requirement of 450 homes. Notwithstanding our support of the use of above projections it is noted that population growth projections and household formation rates have increased since the time of writing the Core Strategy.

Where changes in circumstances have occurred such as above, caution should be taken in order that the economic and social aims of the Core Strategy are not overlooked in setting housing targets. House building targets should be encouraged to increase in line with the rising forecasts for housing need. When setting the housing requirement, there is also the need to consider historic delivery rates, and seek to address any shortfall early in the plan period.

As above, the population and household forecasts are applicable across the District and identify a need for housing overall. The supplied evidence does not take into account the need for growth which arises from individual settlements; this should be taken into account to ensure that sustainable patterns of growth can be established.

Question C - Economic led projections?

Economic led projections within the SHMA assess a 'policy-off' economic growth scenario which does not indicate that the level of growth required would be higher than the demographic led projections discussed above. Care should be applied in relying on these projections which are not reflective of any aspirations for increased economic prosperity which the Council should be seeking to achieve and which growth will help to deliver. The levels of projected growth set out within the SHMA are derived from natural 'policy-off' growth and should be used as a starting point for calculating growth targets and not be set as a target themselves.

The National Planning Policy Framework (NPPF) stresses throughout the importance of economic-led growth and the role that housing delivery plays in establishing that growth. This key aim of the NPPF should not be overlooked.

Question D – Affordable Housing Need?

The SHMA seeks to calculate the net affordable housing need for the District over the 23-year period from 2014 to 2037. The assessment shows an overall need for affordable housing of about 4,000 units over the 23-years (172 per annum) which includes a current need of 582 homes. The analysis can also be used to consider the likely affordable housing need over a shorter period (2014-27) which results in some 2,500 affordable homes (191 per annum). The current policy approach within the Core Strategy is to provide affordable housing for at least 40% of open market dwellings provided within the District; if achieved this would provide some 180 affordable dwellings per year from the Core Strategy's 450 homes target.

As such, the SHMA notes that the analysis would suggest that the affordable need does not provide clear evidence of a need to increase overall housing provision in the District (over and above the need shown by demographic modelling). Currently the Private Rental Sector (PRS) provides a supply of properties to households in 'affordable housing need' (supported by LHA) which is expected to continue, and provide a broad balance between the supply and need for homes from those requiring support.

We disagree with the assessment made by the SHMA above. In the first instance, those in affordable need should not be reliant on the PRS to provide affordable homes which is, by its very nature, private housing and subject to ordinary market forces.

Secondly, as demonstrated by the current backlog of 582 affordable homes, there is a historical under-delivery of affordable homes against needs which needs to be addressed. Even if it could be assumed that the Core Strategy target of 40% of affordable homes across 450 dwelling per annum was achieved, this would still provide a shortfall of affordable housing across the District. In reality however, that 40% target for affordable housing has not historically been met and, despite optimism that the planning system can encourage higher provision of affordable housing, seems unlikely to be met in the future. For example, now out of the recession and in a period of growth, between 2013-14 the District's completions of affordable housing totaled some 39 units; only 15% of open market dwellings built.

As per the provisions of the NPPF, the supply of open market housing should be boosted significantly to provide the homes that are required by the District.

As set out above, the SHMA lacks evidence of housing need within individual settlements across the District. Affordable housing need is generally provided at the parish level for those who can demonstrate a local connection to the area. We consider that it is not possible to consider fully the needs of the Housing Market Area without considering where and how that need is being generated. For example, it is not necessarily the case that the parish or housing sub-area that is most in need of affordable homes is also where demographic population or employment led growth is most likely to occur.

The above is particularly important for the DSVs where affordable need is likely to be locally generated and should be addressed locally. Moreover, DSVs, by nature of their smaller settlement sizes are likely to have received lower levels of historical growth through smaller housing developments which are more likely to have difficulty achieving

the levels of viability required to deliver the Council's 40% affordable housing target. It is crucial that the Council understands where any imbalance between housing provision and affordable housing need exists across the DSVs so that this may be addressed.

Question H – Draft conclusions?

In accordance with our comments above, we support the Council's acknowledgement that the figures for Objectively Assessed Need (OAN) for housing should "leave aside policy considerations" but stress the importance that, in determining planning policies, the Council will need to adjust the level of housing provision necessary respond to market signals or to support the provision of more affordable housing other economic vision and strategy which they set out for the District.

As set out throughout these representations, we consider that one of the major considerations for adjusting the policy approach and housing target will be the need to meet the requirements of individual settlements and the rural areas to maintain and enhance the sustainability of those settlements. We support the Council's conclusion that the figures for housing need set out in the SHMA represent an input to determining future levels of housing provision – not an 'answer' in themselves.

Taking the above into account, we consider the SHMA's conclusions which relate the appropriateness or otherwise of the Council's overall and affordable housing targets to be misplaced. The SHMA concludes that there is limited evidence to increase either the amount of overall housing proposed by the Core Strategy or adjust the percentage of affordable housing sought as part of open market schemes. For the reasons set out above, it is considered that further work is required in terms of determining where need arises and needs to be met before those conclusions can be drawn; such policy decisions should not be taken from an overall view of the District as a whole.

Draft Method Statement for identifying Development Limits (Q6 DL)

Question A: The need to identify development limits in PLAN Selby?

Question B: An alternative policy approach to protect the countryside?

We generally support the need to identify development limits for settlements within Selby as a way of clearly and effectively applying policy across the District. However, an important distinction should be made between the methodology for the definition of a settlement boundary at a settlement, and the policy approach to development in the settlement boundary.

Subject to our comments below, we consider the definition of a settlement boundary at the Principal Town, Local Service Centres and DSVs to be a relatively straight orward and 'policy-off' process which necessitates a tight and logically drawn boundary around the limits of the existing settlement, and to include any planned allocations. However, the approach taken to development at the boundary is a much more complicated task in terms of how best to meet the needs of both the District and individual settlements.

Indeed, Section 3.1 of the above document notes that the purpose of the 'Development Limit' is to provide clear and unambiguous guidance as to where development 'in principle' is likely to be acceptable. We consider that this is an oversimplification of the task of planning positively for development as required by the NPPF. It is considered that a Development Limit should be seen as simply defining the current limit of the built form and urban land-uses and activities, not a planning policy in itself.

Instead, as set out below, it is considered that positive planning for the District may require a policy approach that makes a distinction between sites that are outside but adjacent (or well related) to the settlement boundary rather than the suggested distinction within the above methodology of defining land as simply being 'within' a development boundary or 'open countryside'.

The need to re-adjust the Council's thinking on such matters is highlighted by the wording of 'pre-NPPF' Core Strategy Policy SP2 which seeks generally to resist development in the 'open countryside, outside of development limits'. However, paragraph 55 of the NPPF does not draw such a dogmatic distinction based on defined development limits, and notes that housing in rural areas should be located where it will maintain and enhance the vitality of rural communities. It seeks to avoid only 'isolated' homes in the countryside (subject to exceptions).

As set out within these representations as a whole, one of our key considerations is the importance of meeting the development needs of rural communities through the planning system to maintain and enhance the vitality of those communities. The Council will should ensure its policy approach to defining development limits and applying housing and employment policies within those limits does not effect the strangulation or 'mothballing' of those communities from the growth required to sustain them.

Question C: The proposed methodology for defining development limits?

Subject to the comments above, we generally support the approach to a tightly drawn boundary in defining the 'Development Limits' of the existing settlements. A 'loosely drawn' settlement boundary would serve only to afford the Council a lack of control over the application of its Development Plan policies and encourage development on sites that have not properly been assessed through the planning system.

A specific comment in relation to Eggborough is that it is inappropriate to consider Eggborough and Whitley as essentially having a single Development Limit for the purposes of establishing a planning policy approach to the settlements. Whilst functionally linked in many ways, the settlements are distinct and have separate characteristics that must be acknowledged by the planning system; such as the prevalence of Green Belt land surrounding Whitley which does not effect Eggborough. This is not to say that Eggborough and Whitley cannot be mutually supportive in terms of delivering the sustainable development required to maintain their vitality (by sharing services they are intrinsically linked), but simply an acknowledgement that they are not the same place.

We have a number of comments in relation to the 'Criteria for Defining Development Limits' set out within Section 3.4 of the method statement. At point b) the method statement considers that for land to have a functional relationship to the physical form of the built-up area there must be a high-level of containment, high level of previously developed land (PDL) and topography which increases the sense of containment. We disagree with those criteria.

The extent to which land is functionally linked to the physical form should be determined on the individual merits of the site. For example, there is no reason why a land-use (such as domestic garden, public open space or similar) that is not considered to be PDL, and has a topography which doesn't increase its containment, could not be considered to be intrinsically linked functionally to the physical form of the built-up area. For the above reasons, we disagree with point c) that hotels, schools, gardens with extensive grounds and so on should generally be excluded from Development Limits; the strength of the functional link of land to either the physical form or use of the built-up area should be determined on the facts of the individual sites.

As set out above, it is considered that the defined 'Development Limit' should simply encircle the settlement as it exists (plus any proposed allocations). It is for development management policies to control the use of land within the Development Limits of the settlement, including the development of that land. Seeking to exclude land which is meaningfully within the settlement (such as public open space or residential gardens) seeks, in effect, to pre-determine the acceptability of development of that land which may, in fact, be in a sustainable location within an existing settlement. Similarly, land protected for its nature conservation value or by way of a TPO and so on need not be excluded from the Development Limits of a settlement where it is properly to be considered within the settlement.

We consider an important omission from the above method statement is the importance of relying on local knowledge to help review and define settlement boundaries. The process should properly be informed through a period of consultation with local communities. We would suggest that this would best be achieved through consulting Parish and Town Council's with a requirement to publicise the Development Limit review publically. It should be made clear that the process is not equivalent to a 'call for sites' exercise but a process for identifying omissions from the existing settlement boundary.

Question D: The conclusions about defining 'tight' development limits?

Subject to consideration of the above comments, we agree in principle with the definition of 'tight' development limits.

Draft Method Statement for Site Allocations: A Framework for Site Selection (Q9 SS)

Question A: The overall approach to the site selection process set out in Section 6.3 of the study?

We are supportive of the general approach to sifting and quantitatively and qualitatively assessing sites in terms of their suitability for development. However, as set out throughout these representations, particularly in regard to assessing growth options for DSVs, the site allocation process should have regard to the development needs of each sustainable settlement individually. Sites for allocation within the DSVs should not, as a rule, be compared across the District but rather assess the suitability of sites in relation to that settlement.

Stage 2 looks at availability of facilities, access to employment and accessibility by public transport. Again, this must be in relation to the settlement only, not as a way of comparing sites across the district.

The allocation of development towards the sustainable settlements, which the DSVs are considered by the Development Plan to be, should be seen as a positive contribution towards maintaining their vitality and viability DSVs. The proportion of development which the Core Strategy seeks to allocate to DSVs should not be seen as a burden which must be allocated and directed towards the 'least harmful' location.

Development needs to be located where it will deliver the social and economic benefits which can be delivered by new housing and employment allocations, whilst limiting as far as practicable any harm caused to environmental interests; avoiding significant adverse impacts. As set out within the above method statement, paragraph 152 of the NPPF supports this approach and states:

"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate."

The development growth options for the DSVs are discussed in full below. However, it is not considered appropriate to simply categorise the DSVs in order of sustainability and allocate development in order of preference to those 'more sustainable' locations. Such an approach has no regard to the importance of a DSV in terms of its role to the resident population, its rural hinterland, or the wider housing sub-area.

For example, it is likely to be that a less accessible and isolated DSV, perhaps with more limited services and facilities, plays a greater role in meeting the day to day needs of its population and hinterland than, say, a DSV located near to a Principal Town with good access by public transport and a wide array of facilities; where residents can readily visit nearby larger settlements for their day to day needs. In that circumstance, it would be beneficial to ensure that the more remote DSV receive a sufficient scale of new development which helps to ensure that its function is maintained or enhanced.

Notwithstanding the above, it is acknowledged that some of the qualitative and quantitative assessments, particularly in terms of site constraints, may be applied across all of the DSVs. As will be discussed below, the Council should rightly seek to avoid unnecessary development within the Green Belt and if possible areas of higher flood risk (unless no reasonably available alternatives are available in that settlement to accommodate the scale of development proposed).

Notwithstanding the development needs of an individual DSV, the development of sites within areas of flood risk is likely to be counter-productive in terms of delivering sustainable development. Where development of a DSV is wholly constrained by Green Belt, the Council will need to consider whether there are exceptional circumstances that justify the amendment of the Green Belt boundary.

Finally, with regard to the above, housing allocations at the DSVs should take into account the Council's aims in terms of employment growth at the settlements. With particular reference to Eggborough,

proposed housing growth should reflect the proposed allocation of 5ha of employment land within the DSVs that is likely to be focussed at Eggborough and the A19.

Question B: The details of the site assessment work proposed in Appendix A of the study?

As set out below, it is not considered appropriate for development to be allocated to the DSVs in a manner that is solely proportionate to their location, accessibility or level of services. Indeed, such an approach is considered likely to be counter-productive in terms of maintaining and enhancing the sustainability of the more remote or isolated DSVs which are relied upon to serve the day to day need of their resident population and rural hinterland.

With regard to the table at Appendix A1 it is not considered to be particularly meaningful to categorise developments' accessibility by public transport in terms of travel times to major and intermediate centres for employment. Earlier analysis of the SHMA demonstrates a high level of both in and out commuting to surrounding cities and areas of employment with little evidence to suggest that there is a tendency for residents of any particular settlement to work in the closest settlement to them, or accessible by public transport.

Instead, it is suggested that accessibility by public transport should be measured by the proximity and frequency of available public transport routes. This approach is considered to better reflect the likelihood and reasonable expectation for residents to use public transport to meet their day to day needs. Paragraph 2.56 of the SHMA comments on commuting patterns within Selby and notes almost 41% of working residents live and work in the district and almost 52% of the jobs in the district are taken up by Selby residents. Commuting self-containment levels within the District's boundaries are thus relatively low. The largest outflows are to Leeds and York; followed by Wakefield and East Riding. The above serves to demonstrate that connection to nearby employment centres is not necessarily key to encouraging sustainable patterns of commuting.

Notwithstanding our overarching comments regarding the allocation of development across the DSVs, if the criteria within Appendix A is to be used for the assessment of sites, the table does not give an indication of weighting that might be given to various criteria. It would be appropriate for the application of those criteria in the assessment of sites to be consulted on.

Draft Growth Options for Designated Service Villages

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)*

As set out above, it is not considered appropriate to consider Eggborough and Whitley as essentially having a single Development Limit for the purposes of establishing a planning policy approach to the settlements. Whilst functionally linked in many ways, the settlements are distinct and have separate characteristics. The fundamental difficulty with pairing the settlements for the purposes of the Growth Options document arises when the settlements are assessed against the 'Green Belt' option which considers Eggborough and Whitley as being constrained by Green Belt for the purposes of the assessment; only Whitley is constrained by the Green Belt in terms of availability of development sites outside the development boundary.

The above approach to classification of Eggborough results in an anomalous result of Eggborough being excluded from development under draft proposed 'Option 3' which seeks to avoid development that would require Green Belt release.

In terms of assessing the landscape characteristics of the area, the character assessment is fairly broad brush. Our Client's land concern forms part of SHLAA Site Eggborough – 10 (identified within Appendix B) which is situated to the north of Weeland Road. It is helpfully set out within the landscape appraisal for Eggborough that new development in this location would be set against a backdrop of existing development of few discernable landscape features. We support those conclusions.

In terms of the identification of our Client's land within the Growth Options document, it is worthy of note that the Site can be further sub-divided or partially developed; in particular, the eastern proportion of the Site would provide a logical rounding off of development at the north and west of Eggborough.

Fundamental to the Settlement Profile for Eggborough, and all of the DSVs being assessed, is an analysis of its development needs to establish what is required in terms of development to maintain the vitality of community. The Settlement Profile will need to consider a variety of different inputs to establish the minimum level of development needed to maintain the vitality and viability of the community; including:

- The needs arising from the projected household size change over the plan period (the level of development required to at least maintain the current level of population within the DSV);
- The needs arising from natural population growth for the DSV in terms of housing need (the level of development required to house the natural growth of the population);
- Affordable housing required to meet projected affordable housing need arising from the DSVs resident population; and
- The minimum amount of housing growth required to at least maintain the current level of viability amongst services and facilities, and to help retain and increase local employment opportunities.

Furthermore, to enhance the vitality of the DSVs and their rural communities it will be necessary to establish:

- The current and projected level of affordable housing need for the local community (including the provision of any increased levels of open market housing required to meet that need);
- The level of growth required to maximise the use of viability of services; for example, to fill empty school places; and
- Establish deficiencies in social infrastructure and service provision that can be addressed through growth (for example deficiencies in public open and playspace, village halls etc) and plan for development required to deliver that infrastructure.

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

We do not support any of the growth options presented within the draft document. None of the proposed growth options set out within the draft document will achieve the objectives which consider the Council and planning policy in general should be trying to achieve at the DSVs, namely, maintaining or enhancing the vitality of the rural communities.

Option 1 comprises an even level of growth across the DSVs based on their current population at a rate of approximately 4.75%. This approach does provide all DSVs with a level of growth which is a positive element of the growth option insofar as it will prevent, to an extent, the mothballing and decline in sustainability of some DSVs. However, Option 1 is considered to be over-simplistic and has no regard to the varying levels and type of development that each of the DSVs need. As set out earlier, development strategies for the DSVs should have regard to the demographics, affordable housing need, services and facilities provision and social infrastructure availability in the context of the role that the settlement performs in terms of meeting the day to day needs of the area.

Option 2 essentially seeks to allocate development to the most accessible and already well served DSV's and minimise development to those less so. In light of the above representations we do not support the approach set out within Option 2 as it is seen as counter-productive to achieving sustainable development. Growth Option 2 will essentially serve to bolster the stronger, more accessible and better served communities but force the less well served communities into decline through effectively mothballing the settlements.

As set out above, each of the DSVs have been designated as sustainable locations through the Core Strategy process and tested at examination. Each of the DSVs need a certain level of growth to maintain their vitality and, ultimately, avoid being lost as a Designated Service Village. For a rural district such as Selby, the prevention of any decline of rural communities and the services which make them sustainable should be a top priority.

Section 3.4 of the Growth Options Report notes the approach taken to the previously progressed Site Allocations Document and discusses, rightly, that despite some DSVs being of substantial enough size to accommodate growth they were lacking in facilities or services. Therefore development was proposed to be allocated to allow a 'critical

mass' to be achieved to deliver these services. The same approach should be taken to all of the DSVs which are considered to be sustainable developments.

Option 3 comprises essentially the same methodology as Option 1 albeit that development is not proposed to be allocated to settlements requiring Green Belt release. We do not support Option 3 for the same reasons as set out for Option 1 above. However, it is acknowledged that the eventual growth option for the District is likely to need to have regard to major development constraints on a District wide bases where the constraints are such that development would take away from the sustainability of the DSVs and the District as a whole; for example, over development of the Green Belt or the reliance on land within higher areas of flood risk are likely, on the whole, to reduce the sustainability of rural communities.

It is noted that Eggborough has not been allocated development within Option 3. Within the draft methodology Eggborough / Whitley is listed as being both constrained and not constrained by the Green Belt. As set out above, the above, it is considered that the above anomaly has occurred through grouping Eggborough and Whitley together as one settlement. This approach is inappropriate and Eggborough is not constrained by Green Belt. This should be amended within the document.

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.*

As set out earlier, the level of development to be allocated to each of the DSVs should be allocated based on the development needs of the settlement and its community. The approach should be based upon a bottom-up assessment of at least the minimum level of development that the settlement requires to maintain its current level of vitality and, therefore, its sustainability.

We consider that the preferred approach would go further than the above and set a vision for each settlement and plan positively to enhance the sustainability of the DSVs by identifying the level of development required to meet any affordable housing need and gap in service and infrastructure provision.

Notwithstanding the above, it is acknowledged that the Core Strategy seeks currently to allocate a quantum of development to the DSVs across the District. We disagree that the Growth Option for the DSVs should only seek to allocate the remaining quantum of development to the DSVs over the plan period. Nevertheless, we have set out our comments below on the 'top-down' allocation of development to the DSVs.

In the first instance, we have not sought to review the level of housing growth proposed at the DSVs (2,000 homes as set out within the Core Strategy) or review the level of completions and extant permissions which, the draft Growth Options Report notes, leaves a residual of 769 dwellings to be delivered at the DSVs over the remaining plan period to 2027. These comments do not infer support for those figures, but comment only on the distribution of development amongst the DSVs.

Secondly, notwithstanding the level of development that is ultimately proportioned to each DSV and therefore allocated, these allocations should be seen as a minimum target for development to help meet the District's housing needs. The above target should not be seen an upper limit to development which would otherwise enhance the sustainability of the DSV; in particular through provision of affordable housing and supporting enhanced services and infrastructure.

Whilst the methodology set out in Option 1 or Option 3 is not supported, it is considered that an adjusted combination of the two approaches would be a preferable growth option. The distribution of the remaining development to be allocated through the DSVs through the Core Strategy should take a more balanced approach to the distribution across the District to help improve the sustainability of the DSVs as a whole.

There are various potential scenarios by which to split the residual housing requirement in the Designated Service Villages. Based on the figures set out in the consultation document, the residual requirement for new housing across the DSV's (taking account of completions since 2011 and commitments as of April 2015) stands at 769 dwellings.

The Option 1 growth scenario per DSV presented in Table 7.2 of the Consultation Document is based upon proportionate growth. By applying this scenario, the housing growth levels in each of the seven Sub-Areas illustrated on Figure 10 of the Core Strategy would be as follows (based on 4.75% growth):

Sub-Area	Dwelling Growth (number of DSVs)
Northern	35 (2)
Western	172 (4)
Eastern	140 (2)
Central	208 (3)
South-East	39 (1)
Southern	80 (2)
North-East	139 (4)

Evidently this proportionate growth approach has the potential to lead to a significant housing imbalance across the District. It would result in the majority of housing growth being focused towards the Central, Western, Eastern, and North-East Sub-Areas of the District, areas which already benefit from their proximity to the three main towns of Selby, Tadcaster and Sherburn (and which between them have the majority of the allocated development for the District).

This would leave the southern part of the District (Southern and South-East Sub-Areas) delivering just 119 dwellings over 12 years. Together this is less than what the Central, Western, Eastern and North-East will be delivering individually. Given the proximity of the Southern and South-East Sub-Areas for the M62 Corridor, existing industry (Eggborough Power Station), and proposed industry (Drax Power Station), there is clearly the need for a more balanced approach to the spatial distribution of housing growth across Selby.

In total, there are 18 DSV's identified under Policy SP2 (some of which are combined settlements). Accordingly, an equal share of the current residual of 769 dwellings would result in 43 dwellings per DSV. However, this would still result in an imbalance in housing delivery, as some DSV's are more closely grouped together across the District than others. For example, Eggborough is one of two DSV in the Southern Sub-Area of Selby. In contrast, the North-East Sub-Area and Central Sub-Area each contain 3 DSV's, despite their close proximity to Selby Town and Sherburn.

To ensure a balanced housing delivery across the District, and in view of the economic growth potential in the likes of the Southern Sub-Area owing to existing employment opportunities and the proposed allocation of some further 5Ha of employment land focussed on Eggborough, a more considered approach would involve an allocation of development favoured towards the less centrally focused Sub-Areas with a role to play in sustaining their rural hinterlands; such as Eggborough.

Evidently, as per the thrust of Option 3, some regard must be had to the District-wide constraints which are present through Selby; in particular Green Belt and Flood Risk constraints. Where development through those constraints is not feasible, development should be located elsewhere within the District where it can most enhance the sustainability of the rural area.

The above scenario is considered to be more robust, and one which will inevitably lead to a much more balanced distribution of housing across the District. Given the presence of the main towns of Selby, Tadcaster and Sherburn within the central, western and north-east parts of the District, it is crucial that enough new housing is also delivered in the south of the District to support economic growth and proposals within this Sub-Area, and jobs growth.

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)*

As set out above, we agree with the initial assessment of Eggborough and its landscape value as set out within the Settlement Profile in Appendix B of the consultation document. The land within our client's control, to the north of Weeland Road (SHLAA Site Eggborough 10) is considered to be well related to the existing development

pattern such that any development of the site would be seen against a backdrop of development with no discernable landscape features of value.

At this time, the site is seen as being one of the lowest value areas in terms of the setting of the settlement and the continuity of its boundaries.

Summary

Glade Developments welcomes the opportunity to submit these representations in response to the Council's PLAN Selby evidence base, and trust that these comments will be afforded full and proper consideration.

Our Client seeks a robust and sound approach to the distribution of housing between the DSV's, and one which will result in a balanced delivery of housing across the District to meet economic growth objectives and proposals. The delivery of new housing and economic growth go hand in hand, and it is vital that new housing is delivered in the most sustainable locations at the right time to provide a diverse housing choice which meets local needs.

There is evidently a need to allocate considerable land in order to meet the minimum housing requirements of the District up to 2027, and to address the housing shortfall since the start of the Plan Period. Equally, there is the need for a policy mechanism which supports and facilitates the release of windfall greenfield sites in the ongoing (and potentially lengthy) absence of a five-year housing land supply.

We look forward to remaining notified of the Sites and Policies Local Plan as it progresses.

Yours faithfully

STEVEN GRIMSTER
Associate Planner