

ryan king

From: Kathryn Jukes [k.jukes@directionsplanning.co.uk]
Sent: 15 February 2012 12:44
To: ldf
Subject: Submission to Core Strategy Consultation
Attachments: Selby DC Form DPC 150212.pdf; Final SMPC Core Strategy Representation 150212.pdf

Please find attached our comments in relation to the current consultation, submitted ahead of the deadline.

I would be grateful for confirmation of receipt.

Regards
Kathryn

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Part B (please use a separate sheet (pages 4 - 6) for each representation)

Please identify the topic to which this representation refers:

- (i) The strategic approach to Green Belt releases;
- (ii) The scale of housing and employment development proposed for Tadcaster and the implications for the Green Belt;
- (iii) The overall scale of housing development over the plan period.

Please state the specific Proposed Change number: **PC** See paragraph 1.3 of our submission
(which can be found on the Published Schedule, CD2e)

Question 1: Do you consider the Proposed Change is:

1.1 Legally compliant Yes No

1.2 Sound Yes No

If you have entered No to 1.2, please continue to Q2. In all other circumstances, please go to Q3.

Question 2: If you consider the Proposed Change is unsound, please identify which test of soundness your representation relates to:

(Please note you should complete separate Part B (pages 4 - 6) of this form for each test of soundness you consider the Core Strategy fails.)

- (Please identify just one test for this representation)
- 2.1 Justified
 - 2.2 Effective
 - 2.3 Consistent with national policy

Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Proposed Change, or provide any other comments please also use this box to set out your comments:

Please see our submission

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

Question 4: Please provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound, having regard to the test you have identified in Q2 where this relates to soundness. You will need to say why this change will make the Core Strategy DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see our submission

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

PLEASE NOTE your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original. ***After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.***

Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

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You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B (pages 4 - 6) to this part of the representation form.

It will be helpful if you can provide an email address so we can contact you electronically.

Question 5: Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate at the oral part of the examination?

5.1 Written Representations

5.2 Attend Examination

5.3 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

(Your request will be considered by the Inspector, however, attendance at the Examination in Public is by invitation only).

To discuss fully our submission and continue discussions started at the Examination

(If you are submitting this form as a hard copy please ensure all text is visible and continue on a separate sheet if necessary)

Representation Submission Acknowledgement

I acknowledge that I am making a formal representation. I understand that my name (and organisation where applicable) and representation will be made publically available during the public examination period of the Core Strategy in order to ensure that it is a fair and transparent process.

I agree with this statement and wish to submit the above representation for consideration.

Signed

Dated

15 February 2012

**Representation to the Selby Proposed Changes to the
Submission Draft Core Strategy**

**Submitted on Behalf of South Milford Parish Council
By Directions Planning Consultancy**

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Directions
PLANNING CONSULTANCY

15 February 2012

1.0 INTRODUCTION

- 1.1 Directions Planning Consultancy has been instructed by South Milford Parish Council to comment on the Proposed Changes to the Submission Draft Core Strategy that have been made available by Selby District Council.
- 1.2 The references set out in this representation relate to the Composite Schedule of the Proposed Changes. Reference is also made to the Publication version of the Submission Draft Core Strategy (Jan 2011) where appropriate.
- 1.3 In summary, we object to the following Proposed Changes:
PC1.9
PC5.4
PC5.6
PC5.10
PC5.9
PC5.15
PC5.17
PC5.26
PC 5.14
SUSTAINABILITY ASSESSMENT ADDENDUM

2.0 PC1.9

Paragraph 4.3

- 2.1 The second bullet point of the proposed changes states “Following the intended introduction of a mandatory requirement on Local Authorities to co-operate on cross-boundary planning matters the sub-regional approach advocated in RSS, through the Leeds City Region and York Sub Area, may influence the preparation of local policy in the future.”
- 2.2 The Proposed Changes do not however accord with the sentiment of this paragraph, given that the amended strategy no longer reflects the sub-regional approach for Leeds City Region and the York Sub Area as set out in the Regional Spatial Strategy (2008). The Proposed Changes make the strategy unsound, as the distribution of development has been altered. Instead of 9 per cent of development being directed towards both Sherburn and Tadcaster, 11 per cent is to be directed towards Sherburn and only 7 per cent towards Tadcaster. This will clearly push more development into the west and away from the north of the district, which will in turn affect the delivery of houses to meet the needs of the strategic housing markets. By increasing the distribution of houses in the west and reducing the number of houses in the north, it will mean that there will be an undersupply of houses to meet the needs of the York Sub Area and an oversupply of houses to meet the Leeds City Region housing market.
- 2.3 Furthermore, the redistribution represents a change of strategy. The Council now states in the updated version of Background Paper 3 that the amended distribution will deliver growth in line with local housing need as identified in the Selby SHMA (2009), yet the original Background Paper 3 suggested that it was not going to align growth with affordable housing need, but instead look at concentrating development around Selby. The change in distribution when coupled with the increase in the housing target represents a change in the strategy. Furthermore, the change now means that the Council will not meet its original objectives.

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- 2.4 These points are addressed in more detail under our comments relating to Policy CP2 under section 10 below.
- 2.5 In terms of the Duty to Cooperate, the Council does not appear to have fulfilled the requirements of the Localism Act, which came into effect on the day the Act received Royal Assent. Despite the duty now being a requirement local authorities have to fulfil on a statutory basis in relation to consultation, there is no evidence that Selby has attempted to fulfil the duty through the current consultation process. The Core Strategy is therefore unsound on a legal and procedural basis.
- 2.6 It is understood that the Inspectorate has confirmed that those local authorities that submitted before November 2011 do not need confirm to Provision 110 of the Localism Act. In addition, the issue of whether local authorities who have already submitted development plans to the Secretary of State are required to fulfil the Duty is currently being discussed at a number of Examinations around the England.
- 2.7 At the Bath and North East Somerset Public Examination, the Inspector issued a note (ID/8), which states "In his list of questions, the Inspector referred to whether the new duty to co-operate introduced by section 110 of the Localism Act had been met. This duty has come into effect, but on reflection the Inspector considers that it can only logically apply to plans whilst in preparation. There is no provision for the retrospective application of the duty. The Inspector therefore considers that the duty is not applicable to plans which have completed the preparation stage and have already been submitted."
- 2.8 If Selby had not entered into an adjournment then the issue of the Duty to Cooperate would not have arisen if the Inspectorate's current position is legally sound. However, there is a question as to whether Provision 110 of the Localism Act applies to the Selby Core Strategy because the Council has entered into an adjournment where a number of changes are being consulted upon, and that are subject to the consultation requirements set out in PPS12, the Town and Country Planning (Local Development) (England) Regulations 2004, the Planning and Compulsory Purchase Act 2004, and the Localism Act 2011.
- 2.9 It is understood that the Inspectorate is currently advising that Provision 110 does not apply where a development plan documents has already been submitted, however this advice cannot also be applied to situations where an adjournment has been called. This is because of the consultation requirements of such adjournments, both in terms of established legislation and guidance, and the latest Act.
- 2.10 Turning to Provision 110 of the Localism Act, it states that local authorities are required to engage constructively, actively and on an on-going basis in any process by means of which development plan documents are prepared so far as relating to a strategic matter. A strategic matter is defined as the use of land, sustainable development or infrastructure that has or would have a significant impact on at least two planning areas.
- 2.11 The Provision is quite clear that consultation should be undertaken on an on-going basis and through any process. This means that if local authorities are required to consult on a development plan document through any stage of the process then the consultation should now conform to the new Provision. It will therefore be necessary for the Council to demonstrate that active and constructive consultation has been undertaken with neighbouring

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authorities in relation to the Proposed Changes if the Core Strategy is to be found legally
compliant and sound.

- 2.12 It is understood that under the Provision, consultation is expected to constitute more than just notifying neighbouring authorities of consultation periods and the opportunity to submit comments. Provision 110(6) requires local authorities to consider entering into and publishing an agreement on joint approaches to strategic matters. Such an agreement has not been entered into and the Council has to date only consulted neighbouring authorities, even though the Proposed Changes involve strategic matters of cross boundary importance.
- 2.13 Furthermore, the changes are strategic in nature and are of cross boundary significance. Particularly, in relation to the proposed change to amend the distribution of housing which will impact on the strategic housing markets of Leeds City Region and York Sub Area, and also the West Yorkshire and York Green Belts. Such changes are considered to fall under the provisions of the Duty to Cooperate and so it is necessary for Selby DC to demonstrate what conversations and agreements have been reached with neighbouring authorities. Particularly, Leeds City Council and York City Council, given these are the authorities which will be affected by the proposed changes to the distribution of housing between Tadcaster and Sherburn.
- 2.14 In addition to the amended distribution, the Proposed Changes also set out that the housing target is to be increased and the Plan period extended. These changes mean that Selby is expected to deliver more houses per annum than previously set out in the Core Strategy and also RSS. A higher delivery rate has implications for neighbouring authorities and the sub regional housing markets, which requires the implications to be considered more widely than just by Selby DC.
- 2.15 It is of grave concern that instead of bracing the Duty to Cooperate, the Council has in fact decided to ignore strategic matters in relation to distribution and the housing requirement. Not just by ignoring the consultation requirements set out in Provision 110, but also by failing to take into consideration any cross boundary issues in relation to the housing requirement. Background Paper 14 states that the "Evidence on cross-boundary trends is that there is likely to be under provision of housing against identified housing needs in some surrounding districts. However an important policy principle of the draft Core Strategy is to achieve a better housing-jobs alignment by increasing Selby's economic self containment, and reducing the already high levels of out commuting from the district. Therefore we conclude that it is appropriate for Selby to plan to meet its own housing requirements, but not those of other districts."
- 2.16 This makes clear that Selby DC is ignoring its role and duty in delivering strategic housing needs and meeting sub regional housing requirements. Not only does such an approach not conform with RSS, but it does not meet the requirements of the Duty to Cooperate as agreement to this new approach has not been sought from neighbouring authorities. Furthermore, the approach now ignores the draft NPPF which makes clear that local authorities should take account of cross boundary housing need, including migration patterns.
- 2.17 There is also another point to make in terms of the Duty to Cooperate in relation to future DPDs. The Council is proposing to review Green Belt boundaries through the drafting of the SADPD. This will involve reviews within two designated Green Belt areas that were first

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identified for their significance beyond Selby. This means that the Council will need to demonstrate how it fulfils the requirement of the Duty to Cooperate in relation to the Green Belt review. It would therefore be appropriate for the requirement to be referred to in the Core Strategy in order to make clear that the Green Belts will be reviewed with reference to the neighbours on whom the review may impact.

3.0 PC5.4

Paragraph 4.19

- 3.1 This amendment proposes to update the population growth figures for Tadcaster and Sherburn. The amendment reiterates that Sherburn has experienced a level of growth which has been out of step with Tadcaster and which confirms how Sherburn already experiences strong out commuting to Leeds. Paragraph 4.21 of the Core Strategy states that services, facilities and job growth hasn't kept pace with the level of housing growth. To now propose an even greater rate of growth is not going to result in a sustainable pattern of development, as it will only serve to exacerbate the historic pattern of development. This is because the Council is not proposing any changes to the strategy to aid growth of jobs or provision of services and facilities in support of the increase in the housing target for Sherburn.
- 3.2 The strategy now also looks to ignore the population decline identified for Tadcaster under paragraph 4.19, as the Proposed Changes set out a reduction in the housing target for the settlement under Policy CP2. The Core Strategy originally set out a strategy to address the issues faced by Tadcaster in terms of the lack of growth and low level of development. The Proposed Changes now set out a strategy that ignores the issues faced by Tadcaster by proposing a level of expansion that will not address the needs of the town.
- 3.3 By updating the population figures for Sherburn and Tadcaster, the Council has simply highlighted the deficiencies in the current strategy and how the Proposed Changes will exacerbate existing problems. This is simply unsustainable and constitutes a significant change in the strategy that cannot be introduced at this stage of the process. The changes in the strategy are evidence in Background Paper 3 where the two versions set out quite different strategies for distribution based on different reasoning. It is unclear how the Council believe that it can follow one strategy where the emphasis is on brownfield development and pushing development into Selby, and then change to a strategy that aims to meet local housing need despite this meaning a higher rate of greenfield development.

4.0 PC5.6

Paragraphs 4.37 to 4.39

- 4.1 Introduction of a new policy at this stage which constitutes more than a minor amendment is unsound. The Procedures Guidance includes section 9 which addresses exceptional procedures. In reading the section, it is clear that where a local authority introduces changes which result in a substantially revised document following submission then it is unlikely to be sound and a local authority should instead withdraw the document or it should be found unsound by an Inspector.
- 4.2 The Council has identified that PC5.6 is more than a minor amendment. As only minor amendments can be made through the examination process then the document is now considered to be unsound.

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- 4.3 Policy CPXX is a wholly new policy which has not been considered before the suspension and this current period of consultation. It is therefore appropriate to reflect on how the need for such a Policy has arisen. The Submissions version of the Core Strategy set out within supporting text, such as paragraphs 4.37 to 4.39 and paragraph 5.22 that a localised review of Green Belt boundaries may be required where a lack of deliverable sites were identified. This was in relation to the level of growth identified within the Core Strategy at that time. Policy CPXX was called for because it is necessary for a Core Strategy to set out the intention for a Green Belt review along with the criteria within a specific policy framework. On its own, Policy CPXX is welcomed in principle as it provides the required framework for a Green Belt review within the correct level of DPD.
- 4.4 However, the purpose of CPXX was to provide a framework for localised reviews associated with the level of growth identified within the Submissions version of the Core Strategy. The evidence base suggested that the review would be limited to only a few settlements, including Tadcaster and Fairburn. This is no longer the situation, as the Council is now proposing to extend the Plan period and increase the housing requirement, which means that more land needs to be released for development than previously envisaged. Policy CPXX therefore no longer provides a framework for localised reviews. It instead provides a framework for potentially a fundamental review of Green Belt boundaries across the district due to the level of development that needs to be accommodated. This point is substantiated by the change in strategy associated with the distribution of development, as set out in our comments under paragraph 3.3 above.
- 4.5 The Council has not offered in the evidence base associated with the current consultation any indication as to the implications of the changes now proposed in relation to deliverability of the amended housing target and how the deliverability of the amended strategy compares with the submitted strategy, plus whether the difference amounts to a significant shift in the strategy. This matter is raised in relation to South Milford by way explaining the implications of the amended strategy and how different it is to what was originally proposed. In the SADPD, it was clear that the housing requirement set out in the Submissions Core Strategy (98 houses) could be accommodated within the settlement boundary for South Milford and within an existing Local Plan allocation. The capacity of the allocation provided flexibility which would enable South Milford to deliver some of Brotherton's housing need (16 units) under the Council's Housing Pool approach. However, given the increase in the housing target, the flexibility that existed means that South Milford could still potentially accommodate the increase proposed in the housing target in relation to delivering its own share of development based on a 10 per cent increase. There is however no spare capacity to accommodate the housing target of neighbouring villages such as Brotherton. This then leads to the question of whether the strategy can be delivered in terms of either Brotherton accommodating its own housing need or whether a review of the Green Belt around South Milford will be required to accommodate housing need from surrounding settlements if constraints suggest those neighbouring settlements cannot accommodate their own growth. It is quite clear that the Proposed Change could lead to a significant change in strategy, which has not been fully explained or assessed in the consultation and has not been demonstrated to be deliverable.
- 4.6 Furthermore, there is a question as to whether the changes proposed result in a fundamental shift in strategy given the implications the increase in the housing target has for triggering a comprehensive review of Green Belt boundaries across the district. Clearly, needing to review

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boundaries of more than just one or two settlements, to include a potential review of the Green Bet boundaries around most of the settlements in the hierarchy, represents a comprehensive Green Belt review which the original Core Strategy did not envisage or plan to trigger.

4.7 This means the Core Strategy is potentially unsound as the Examination process should only result in minor amendments and tweaks to the strategy, and not a fundamental shift. Particularly, a shift that is being introduced so late on in the process and only following a suspension of the Examination. The process is after all intended to be frontloaded and introducing fundamental changes so late on is contrary to the the planning system.

5.0 PC5.10

Paragraph 5.4

5.1 We object to the increase in the housing target on the basis proposed, particularly because it does not reflect the matters raised by the Inspector in the 'Ruling on Request for Suspension of Examination'.

5.2 The Inspector identified under paragraph 9 four considerations that need to be taken into account when he considers the overall quantum of housing development over the plan period. These were listed as:

- the latest CLG trend-based household projections which suggest a significant increase above the RS target of 440 dwellings per annum for the District;
- the statement in policy H2 of the RS that a partial review of housing growth should be completed by 2011, coupled with the EIP Panel's finding that there was insufficient evidence to recommend housing figures for the 2021-2026 period;
- the findings of the latest SHMA and the evidence about how this should be interpreted;
- the evidence at the hearings about migration levels, commuting patterns and so on.

5.3 The proposed increase in the housing target is unsound, because the basis on which it has been calculated ignores the need to update the housing target on the basis of the most up to date information; ignores the latest CLG trend-based household projections; ignores the findings of the latest SHMA; ignores migration levels and commuting patterns; and instead relies upon a methodology which is not robust as it relies upon out of date baseline data.

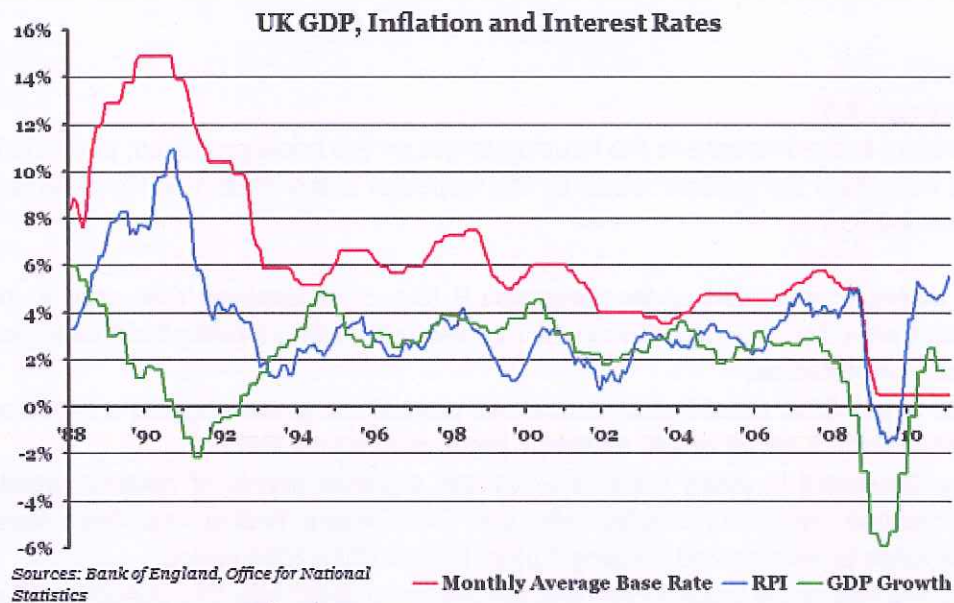
5.4 It is appropriate to consider each of the matters that the Inspector raised as the basis of testing the housing target in turn in relation to the Council's Proposed Change to increase the housing target to 450 per annum:

The latest CLG trend-based household projections which suggest a significant increase above the RS target of 440 dwellings per annum for the District

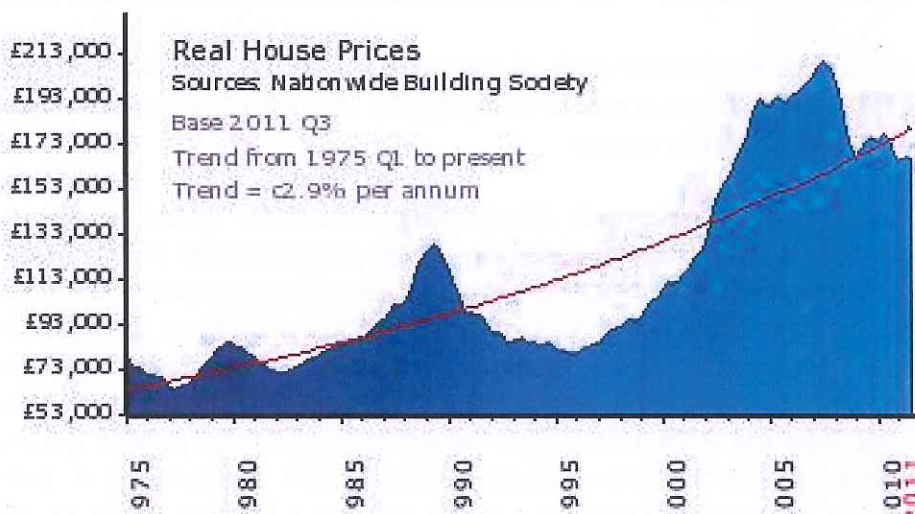
5.5 The Council commissioned Arup to assess the housing requirement and on the basis of the findings, the Council is now proposing 450 dwellings per annum. However, rather than use the latest CLG trend-based household projections, the Arup assessment and the proposed housing target is instead based upon the 2004 household projections. The Arup assessment concludes "that the 2004 based CLG household projections provide the most robust and appropriate basis for identifying future housing growth requirements in Selby District. The 2004 based household projections are for 450 net additional dwellings per annum. This

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 conclusion is based on the recent evidence on economic and migration trends and forecasts, the housing market, and housing completions” (page i).

5.6 This conclusion is considered to be unsound, as it is simply misplaced to suggest the 2004 projections are more robust and reflect circumstances similar to current conditions. The Arup report states that the “CLG household projections reflect ONS population projections and projections on average household size. A major factor in the population projections are forecasts of future migration trends, which in turn are influenced by assumptions on the economy. Generally the CLG household projections reflect the trends over the five years previous to the base-year” (page i).



5.7 The chart above shows the economic conditions over approximately the last 25 years. It demonstrates that neither the 2004 projections nor the 2008 projections are representative of recent economic conditions. During the five years previous to 2004 the economy declined before entering a steady period of growth. In the five year period predating 2008 the economy increased before the recession hit and the economy nose-dived.



- 5.8 In terms of house prices, neither of the five year periods before 2004 or 2008 represent what might happen in the future either. This is because house prices increased through a period of boom following structural changes to the rate of inflation in the early 1990s. The chart above is representative of the general trend in changes to house prices.
- 5.9 CLG publishes housing and planning statistics each year. The latest publication for 2010 show that the number of planning permissions granted and houses being built increased over the five years predating 2004 and then declined for the five years before 2008. Again, the 2004 projection trends do not follow recent trends.
- 5.10 Clearly, it is not robust or correct for Arup to have concluded that the 2004 projections reflect more closely recent conditions given the background conditions to the 2004 projections were very different to those of today, and the assumptions were based on growth rather than (at best) stagnation. The assessment cannot be relied upon as justified evidence that would lead to a sound strategy. The report should therefore be set aside and the basis for the housing target needs to be re-assessed. Until this exercise has been completed then the Core Strategy cannot be considered sound.
- 5.11 Furthermore, paragraph 11 of the Inspector's decision to suspend the examination refers to the Council looking at recent projections in order to determine whether there are indicators to support the RS figure. The Arup assessment has not justified the housing target on the basis of up to date indicators, but instead relies upon historic data that is not representative of current trends and has subsequently been updated.
- 5.11 In relation to a sound approach, the draft NPPF sets out that the SHMA should form the basis for assessing the housing requirement in terms of both affordable and market housing demand and need. In addition, local authorities are expected to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as families with children, the elderly and people with disabilities). The Arup assessment does not fulfil this requirement.

The statement in policy H2 of the RS that a partial review of housing growth should be completed by 2011, coupled with the EIP Panel's finding that there was insufficient evidence to recommend housing figures for the 2021-2026 period

- 5.12 The extension to the Plan period is welcomed, as it will provide more certainty to stakeholders given the Core Strategy should not need to be reviewed quite as early as would otherwise be the case. However, the housing requirement for the extended period of time is not sound because the methodology used is flawed and the evidence is not robust, as set out in the preceding paragraphs of this section.
- 5.13 The statement in Policy H2 of RSS refers to not just the extension of the Plan period, but also the need to update the housing targets themselves. This has since been supplemented by other calls for the housing numbers to be updated, including by the Chief Planning Officer following Eric Pickles' announcement that RSSs were to be revoked.
- 5.14 The letter from the Chief Planning Officer dated 6th July 2011 set out that "Authorities may base revised housing targets on the level of provision submitted to the original Regional Spatial Strategy examination (Option 1 targets), supplemented by more recent information as appropriate." The Chief Planner thus makes it quite clear that the RSS evidence base (not the

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targets set out in RSS, but the evidence base) is only the starting point for determining the housing targets, and that more up to date information should also be taken into account. This therefore leads to the assumption that no local authority would rely upon the 2004 household projections, but would instead look to see how more recent evidence might result in the 2004 being updated. It is therefore surprising that Selby DC has decided to accept the recommendation of Arup's to ignore subsequent updates to the evidence and instead rely on the 2004 projections on the basis that they 'reflect recent economic trends'.

- 5.15 This is an unsound approach which ignores DCLG advice and also emerging national planning policy. The Arup's report does not provide a robust basis on which to base the Core Strategy.

The findings of the latest SHMA and the evidence about how this should be interpreted

- 5.16 The draft NPPF requires local authorities to prepare a Strategic Housing Market Assessment "to assess their full housing requirements, working with neighbouring authorities where housing market areas cross administrative boundaries."
- 5.17 The latest version of the SHMA was prepared by GVA on behalf of the North Yorkshire Strategic Housing Partnership. It was published in November 2011, which was before this current consultation on the Core Strategy began. It takes into account wider strategic housing market areas, migration and demographic changes, plus economic conditions. It also identifies market and affordable housing need in accordance with the national guidance for preparing SHMAs. The assessment is therefore considered to be sound and forms a robust piece of evidence to inform the preparation of a Plan. On this basis, it is a mystery why Selby DC has chosen to ignore the findings in favour of the Arup recommendation, particularly as the Arup assessment recommends using base data and projections that are out of date and that do not reflect current conditions or assumptions around migration.
- 5.18 Appendix 8 of the SHMA sets out the Selby district assessment. It found that the "latest household projections show a future growth in household numbers. Migration plays a significant role in this growth although even without migration the recent levels of natural change in the authority are projected forward to show a sustained demand from this component alone. The constraining of the demographic scenario to match projected employment growth levels, which as noted above are relatively low, shows a lower level of household growth over this period. This reflects the fact that the authority, whilst projected to have an ageing population, is projected to grow naturally and attract in-migrants of working age. Additional job generation above the baseline forecasts will therefore be important if demographic trends are to be sustained" (page 78).
- 5.19 On the basis of the analysis, the SHMA concludes that "In terms of numbers under the SNPP scenario the authority is projected to see an average increase of 520 households per annum. Under the employment constrained scenario this falls to just over 400 households per annum" (page 78).
- 5.20 The Arup assessment refers to only two of the three scenarios presented in the North Yorkshire SHMA. This is because Scenario 1 and 3 provide the upper and lower range for the recommended housing target. The proposed housing target in the Arup report sits roughly in the middle of the SHMA range.

- 5.21 However, the Arup assessment of the proposed housing target of 450 fails to properly weight the 2004 projection and fails to recognise that the 2004 projections are not representative of recent economic or migration trends. We therefore object to the proposed housing target and instead suggest it should be closer to 403 on the basis that Scenario 3 of the North Yorkshire SHMA forms a more robust and credible basis on which to determine the housing target. This because it uses the most up to date 2008 projections and takes account of recent economic events and market conditions.
- 5.22 We agree with the findings of the Arup assessment in relation to Scenario 1, as the 2008 based projections, like the 2004 projections, are not representative of recent economic condition and the level of projected growth is unlikely to occur.
- 5.23 Furthermore, Scenario 3 is more realistic as it takes account of migration patterns, reflects recent dwelling completion rates and takes account of the staggering cliff the economy has fallen off the edge of in recent years, as illustrated in the charts above.
- 5.24 In relation to both Scenario 1 and 2004 projections, the Arup assessment refers to historic completion rates. It should be noted that historic completion rates are not an appropriate basis on which to determine the future housing target. This is because historic rates do not take into account future strategy or future needs. Such a consideration, whilst useful as a reference point, should be set aside when considering future targets.
- 5.25 Given that the RSS is still a material consideration and Government advice is that the evidence base for the RSS targets form the starting point then we can only conclude that the annual target of 440 is currently still appropriate. At this moment in time, it is understood that it is not appropriate to reduce local plan targets below the RSS targets, therefore 403 per annum would not be in accordance with RSS.

The evidence at the hearings about migration levels, commuting patterns and so on

- 5.26 Two important factors in determining the housing target and any strategy are migration and commuting. It is therefore surprising for Selby DC to now propose to simply provide for its own housing need and not meet cross boundary housing need or to respond to migration patterns. It is also difficult to understand how the Council believes the amended strategy will aid self-containment, as set out in Background Paper 14.
- 5.27 The North Yorkshire SHMA identified that a significant proportion of people commute from local authorities around York and Leeds into the two cities (paragraph 7.108). This finding is in line with recognised travel to work patterns which recognise that York and Leeds provide employment hubs for neighbouring authorities.
- 5.28 The North Yorkshire SHMA for Selby concluded that the "ONS mid-year estimates of population indicate that the population of Selby has continued to grow with migration remaining an important driver of growth. Strong migratory links continue to be evidenced with York and Leeds, with Selby playing an important role in the functional markets of both of these economic centres. The authority has also seen year-on-year positive net levels of natural change (more births than deaths)" (page 78).
- 5.29 The strong migration patterns between Selby and Leeds and York are confirmed in the Council's Background Paper No. 1 Travel to Work Patterns (January 2007), which splits the

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district into distinct areas where Sherburn is included within area two and Tadcaster is included within area three. The Background Paper makes clear that the majority of people living within area two commute to Leeds whilst the majority of people in area three commute to York.

- 5.30 Furthermore, the RSS strategy took into account migration and commuting patterns, as well as sub regional housing markets. The Core Strategy currently needs to conform with this strategy and should not suggest a different approach at this time. To do so is unsound.
- 5.31 We do not believe that the amended strategy will deliver self-containment, because the proportion of development in Selby has been reduced, whilst the proportion of development in Sherburn and the DSVs has been increased. This change in strategy will encourage a greater level of commuting and migration into the Leeds City Region than envisaged by the Submission version of the Core Strategy, particularly when coupled with the increase in the housing target. It will also lead to a greater pattern of disbursement, as well as an increased need to release Green Belt land and develop greenfield land.
- 5.32 This pattern of development is unsustainable and the Proposed Changes represent a shift in the strategy as set out in the Submissions version of the Core Strategy. We are concerned that such changes collectively result in more than a minor amendment to the Core Strategy that would be inappropriate to introduce so late into the process. Particularly because the process should be front loaded and should have been based on early consultation and collaboration. The Council is instead introducing a number of significant changes that go beyond what the system intends at this current stage.

6.0 PC5.9

Policy CP1 Part A(d)

- 6.1 The wrong part of Policy CP1 has been referred to in the Proposed Change. It should be Policy CP1 A(e), rather than A(d).

7.0 PC5.15

Paragraph 5.17

- 7.1 This paragraph explains the reason behind the amended proportion of development allocated to Tadcaster under Policy CP2. We object to the reasoning, as it suggests that there is an absence of DSVs in the Tadcaster sub-area and limited development opportunities for new houses, and that the area is geographically remote. The reasoning is factually incorrect.
- 7.2 Analysis of the Settlement Sustainability Assessment has found that there is a glaring error, whereby Escrick has been wrongly categorised as a Level 3 settlement, when in actual fact it should be a Level 2 settlement. This error has led to the wrong classification of Escrick and it has been downgraded as a result, despite its historic categorisation as a settlement worthy of development in previous versions of statutory development plans for Selby.
- 7.3 Furthermore, Escrick is sustainable relative to other DSVs. It is well connected, given it is adjacent to the A19 which connects Selby to York and there is a regular bus service. The settlement is also important for meeting strategic housing needs given it serves commuters accessing the York area and also those working in Tadcaster and Selby. The village also has an abundance of local facilities and services that serve a wider catchment area than simply

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Escrick, and on a scale greater than other DSVs. It also provides employment opportunities for the surrounding area unlike other DSVs.

- 7.4 If the village was reclassified in accordance with the Council's own scoring system then it would result in the village exceeding the scoring of other DSVs, which means it should be classified as a DSV, due to its relative sustainability with other DSV and lack of physical constraints to development. Land could then be allocated to meet development needs resulting from within the northern sub-area of the district. This would enable some of the Tadcaster housing need to be delivered locally rather than being moved to Sherburn, which is in a different housing market area both at the local and strategic level, and serves a different journey to work catchment at a strategic level.
- 7.5 The updated SA states on page 18 that "Allocation to Tadcaster should meet its own needs, rather than redistributing development elsewhere which would increase travel if it is further away from essential service and facilities." Despite this statement, the Council is now proposing to redistribute growth to reduce the level of growth in Tadcaster and redistribute the housing requirement to Sherburn and the DSVs. The Council is now proposing a very different strategy to that set out in the Suibmissions version of the Core Strategy, which is evident from reading Background Paper No. 3.
- 7.6 Tadcaster clearly cannot deliver housing need for the whole of the northern sub area due to the restricted land supply that was identified at the Examination. It would therefore make sense in sustainable development terms to look to settlements within the same geographic area and same market area to deliver the identified development need instead. This approach would be more aligned with the original strategy than the approach which has been put forward in the Proposed Changed. However, it appears the Council has not identified this as an option and such an option has not been appraised as part of the Sustainability Appraisal. Please see comments under section 12 below relating to the SA.
- 8.0 PC5.15**
Paragraph 5.18
- 8.1 This proposed change does not make sense, given it intends to replace paragraph 5.18 with words that actually appear to follow on from paragraph 5.18. Should the proposed words not be inserted after 5.18 and before 5.19 rather than replace 5.18?
- 8.2 Irrespective of the formatting, we object to the proposed wording. The location, nature and scale of the DSVs in the western sub-area is due to the levels of growth experienced over the last twenty years. If Selby DC were to properly plan to meet identified development requirements from the northern sub area within that sub area then it too could meet its own needs.
- 8.3 Please see our comments under section 7 above and section 12 below relating to the need for sub area requirements to be met within the sub area and how the Core Strategy and SA have failed to fully assess all reasonable alternative options.
- 8.4 The Council recognises that this Proposed Change is more than a minor amendment to the Strategy and therefore has the potential to be unsound. We would suggest that the proposed

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change is unsound, because it will result in an unsustainable level of growth occurring in the western sub area of the district which will lead to increased commuting into Leeds.

- 8.5 It is unrealistic and therefore unsound to suggest that DSVs such as South Milford can accommodate more development than that which was set out in the Submissions version of the Core Strategy. The settlement is only a village after all, where the facilities and services only serve the immediate community. The village also accommodates commuters who use the local train station to access Leeds. It is not a village that would contribute to self-containment of Selby district, which was at the heart of the Submissions version of the Core Strategy.
- 8.6 Consultation was undertaken last years across South Milford to establish the communities' views of the future of the village. The results identified that any further growth would require the village to be upgraded and for services and facilities to be planned for to meet the needs of a larger population. The nature of responses suggested that the village is at a tipping point where some responses suggested that the character of the village was under threat and others suggested more facilities were required such as gyms, sports centres, and supermarkets – facilities typical to towns rather than villages. South Milford is under strain from development, and is set to accommodate development beyond one allocation over the Plan period due to a number of brownfield sites which have gained planning permission recently. Pushing more development onto South Milford and into the west of the district is not the answer to the problems in Tadcaster. The Council should instead look at alternatives, such as accommodating housing need identified in Tadcaster in settlements in the northern sub area where development will be welcomed. This will allow for local and strategic housing need to be delivered in the right place and will deliver a more sustainable pattern of development than the Council's current strategy.
- 8.6 At this time there is no SA to appraise the impact of growth beyond the levels proposed in the Submissions version of the Core Strategy. It is therefore difficult to determine the extent to which the Proposed Changes will result in a shift in strategy and a more than minor amendment to the Plan. It is therefore difficult to understand how the Inspector will be able to find the Core Strategy sound.
- 9.0 PC5.17**
Paragraph 5.20
- 9.1 We object to the amount of development which is to be accommodated within the DSVs and the fact that the proposed changes will result in the proportion being increased from 'about a quarter' to 'just over a quarter'. It should also be noted that the descriptions are incorrect in any event, as the proportion has been increased from 'just over a quarter' (27%) to 'just under a third' (29%).
- 9.2 The proportion has relentlessly been increased from the start of the Core Strategy process to a point where each DSV could end up accommodating approximately a third of the amount of development proposed for Tadcaster. Furthermore, the proportion of development to be accommodated within the DSVs has gone up whilst the amount to be accommodated in Selby, Sherburn and Tadcaster has gone down.

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- 9.3 The RSS strategy requires at least 50 per cent of development to be accommodated in Selby. The Submission version of the Core Strategy actual allocated 57 per cent of development to Selby. It is therefore disappointing to see that this has now been decreased to 51 per cent. Introducing such a change means the proposed change is now less sustainable than the position from which the Council started.
- 9.4 Also, there has been a change in Core Strategy as the intention was to encourage self-containment by concentrating development in Selby and to limit the amount of development in the DSVs. Now that the Council is proposing to increase the amount of development in the DSVs (which will result in a higher annual delivery target than in Selby) then it is bound to result in a change to the original strategy.
- 10.0 PC5.26**
Policy CP2
- 10.1 We have already commented on many aspects of the proposed changes to Policy CP2 and so we would ask for our comments under sections 3, 5, 8 and 9 to be referred to in relation to PC5.26 too.
- 10.2 We object to the basis on which the increase in the housing target is proposed, as the Arup Report is not robust, as we have set out under section 5 above.
- 10.3 We do however welcome the extension to the Plan period as it will provide some certainty in relation to the framework for development over the next fifteen years.
- 10.4 We object to the amendments that have been to the distribution of the housing requirement, not least because it will result in an unsustainable pattern of development that will not deliver the vision of the Core Strategy, as set out under sections 3, 8 and 9 above. In particular, we are concerned that the proposed changes have resulted in the proportion of development in Selby and Tadcaster being reduced, the proportion of development in Sherburn and the DVS being increased.
- 10.5 The Council had stated that it wishes to follow a strategy that would encourage self-containment and make best use of brownfield land. However the proposed changes will result in the exact opposite of this objective being met, as the amount of land being allocated in the most sensitive parts of the district to in-migration and commuting are to be expanded beyond the level at which housing need to meet levels of self-containment and local housing need will be met. Furthermore, greenfield sites currently in the Green Belt will need to be released on a more extended basis than originally intended in the strategy.
- 10.6 The Council's evidence base has identified the need to increase employment opportunities within Selby in order to provide local employment opportunities for Selby residents that will counter the current patterns of commuting to Leeds and York. The Submissions version of the Core Strategy therefore set out the aim to create a better balance between housing and employment in order to promote self-containment. However, the changes to Policy CP2 no longer support this strategy, as the proportion of housing development in Selby is to be reduced, whilst the amount of development designated to the DSVs is to be increased. Most of the DSVs do not support self-containment, but instead provide for strategic housing needs relating to the York Sub Area and Leeds City Region economy (Paragraph B.73 of the Selby

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SHMA 2009), therefore the Proposed Changes will encourage commuting, particularly as the housing target has been increased.

- 10.7 At the Examination, the idea of recognising the importance of certain DSVs was discussed due to their relationship with Selby, where the proximity of Barlby, Brayton and Thorpe Willoughby means that they contribute to the strategy to deliver self-containment. The Proposed Changes do not however propose any amendments to recognise the role of these settlements, and it still appears that the strategy treats all the DSVs the same. The proposed increase in the proportion of development to be distributed to the DSVs raises the need to address this deficiency in the strategy. The increase in the proportion of development means that the strategy has the potential to have a significant effect on certain DSVs if the housing target is not distributed with some sensitivity and within an appropriate framework.
- 10.8 In relation to Policy CP2, we are also concerned with criterion E, as it does not provide an appropriate framework for determining the distribution of development across the DSVs. The criterion suggests that allocations will be sought in the most sustainable villages where local need is established through a Strategic Housing Market Assessment and/or other local information. Given neither the Selby nor North Yorkshire SHMA contain any analysis of local need for the DSVs then we do not see how criterion E might reasonably be used as the basis for determining allocations. Indeed, the SADPD Preferred Options consultation document makes clear that the distribution has not been based on the SHMA, instead it is based on a number of considerations, which includes Officer's own judgement in adjusting the final figure. The Criterion is therefore considered to be misleading as it does not describe the actual process the Council has followed in preparing the SADPD.
- 10.9 It is of grave concern that the approach in the Core Strategy and the SADPD for distributing development across the DSVs are not the same. Particularly, given the increase in the proportion of development will lead to the need for the Council to review the approach set out in the SADPD in relation to distribution. The process for determining the distribution should not be left for determination through the SADPD in any event, which is currently the case.
- 10.10 In the Executive Board Paper dated 24th November 2011 relating consultation on the SADPD, Officers set out the approach to distributing the housing requirement, which included reference to a 'Housing Pool'. We are concerned that the Core Strategy is unsound because the approach will no longer work and the Council has not yet identified or tested a sustainable method to deliver the increased housing target. The Housing Pool approach suggests that as a planning application in South Milford will deliver 114 houses (its actually 115), South Milford has the potential to accommodate the 16 houses that cannot be accommodated within Brotherton. However, given the Core Strategy now proposes a higher housing target than the actual situation then South Milford does not have the capacity to take any of Brotherton's shortfall. This is because if the increase in the annual housing target is evenly distributed across all the DSVs then South Milford will need to accommodate a further 11 dwellings. South Milford will therefore be in a situation of oversupply by only 6 houses, not the 17 currently identified in the current consultation document.
- 10.11 The Housing Pool approach will therefore need to be thought through again as it simply will not work given the proposed increase in the district housing target. It is quite clear that instead of being able to redistribute a few houses across a number of the DSVs and only review the Green Belt boundary of one or two of the DSVs, the increased housing target will

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result in the need for a comprehensive Green Belt review across most of the villages to realise enough land to meet the increase in the target. It should be noted that South Milford Parish Council does not support a Green Belt review around South Milford, as it would be contrary to the views of the community.

10.12 The SA does not make any assessment of whether the increased housing target can be accommodated within the parameters of the original strategy. At this time, it is considered that there is simply insufficient evidence to understand whether the Proposed Changes can be delivered or that the Core Strategy will deliver a sustainable pattern of development. The Core Strategy should not be found sound until the implications of the Proposed Changes are fully understood in terms of the need for a comprehensive Green Belt review and the process by which the distribution of development is to be determined has been accurately set out to replace Criterion E.

**11.0 PC 5.14
POLICY CPXX GREEN BELT**

11.1 Through the Examination process we suggested that the Core Strategy should include a policy to provide a framework for any Green Belt review given that the Core Strategy would not be sound without such a policy. However, now a policy has been drafted we are in a position where we have no choice but to object to the policy. The first reason is that it includes a number of irregularities where wording is not specific enough or the wrong terminology has been used, which could lead to misinterpretation. The second reason is that it now provides a framework for the comprehensive review of Green Belt across the district, which was not the intention for such a policy in the first instance. This is because the Council is now proposing to increase the housing target beyond the capacity of existing development limits.

11.2 Criterion D includes a number of criteria where the language is too ambiguous and not prescriptive enough. The criterion suggests that the purpose of a review might be to address anomalies, yet the policy does not set out how anomalies might be defined. This could result in an endless list of situations where the Council wishes to review boundaries but not in accordance with PPG2. Not least when coupled with the idea that any review will be to establish boundaries with strong physical features. PPG2 does not refer to physical features. Instead it refers to defensible boundaries. Defensible boundaries and physical features are not the same. The wording should therefore be amended to accord with the language found in PPG2.

11.3 It is of grave concern to see that the Council is now proposing through Criterion D4 to identify and designate Safeguarded Land for growth beyond the Plan period. Nowhere in previous versions of the Core Strategy has the designation of Safeguarded Land been mentioned. It is therefore unsound to introduce such a significant change at this late stage for four reasons:

1. The introduction of the idea of safeguarding land has not been subject to appropriate and front loaded public consultation, as it has only just been introduced at this stage.
2. The SA Addendum does not appraise the impact of safeguarding land therefore there is no assessment of whether the change undermines the sustainability credentials of the Core Strategy.
3. The Council has not considered all reasonable alternatives in relation to the concept of safeguarding land (such as not safeguarding land, safeguarding land for the first five years or safeguarding land for the whole of the next Plan period).

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4. Safeguarding land does not form one of the exceptional circumstances set out under Criterion E of Policy CPXX given it relates to delivering development in the next Plan period rather than the period covered by the Core Strategy.
- 11.4 The Proposed Changes are simply intended to introduce minor amendments to make sound issues which the Inspector raised at the Examination. The Proposed Changes are not intended to introduce new issues, such as the idea of safeguarding land. Particularly, as it could result in land being released from the Green Belt on a scale well beyond that proposed in the Submissions version of the Core Strategy.
- 11.5 Reference to Safeguarded Land therefore needs to be deleted if Criterion D4 is to be found sound and in accordance with procedures for introducing changes following submission of a DPD (paragraph 5.23 of the Examining Development Plan Documents: Procedure Guidance, Aug 2009).
- 11.6 We are also concerned with Criterion E2, which sets out that the Council is to consider amending Green Belt boundaries around settlements where growth does not derive, but instead to accommodate growth from neighbouring villages where the Council deems it to be more sustainable to do so. We strongly object to this approach.
- 11.7 Growth should be accommodated at source in order to meet local need for development which results in the need for land. To divert growth away from where the demand arises will mean that the demand has not been met at source and development will not be sustainable, as it will result in a number of detrimental social, environmental and economic consequences.
- 11.8 The Council is required by the draft NPPF to deliver sufficient houses to meet housing need and a suitable supply of land that is flexible and will respond to changing market patterns. Housing need and demand should therefore be met where it arise in order to ensure local housing need is satisfied. To not plan accordingly will lead to unsustainable patterns of development. Not least because, building houses where there is no demand or need will not necessarily result in people wanting to live in that area and it can cause house price increases in the area where need is not satisfied.
- 11.9 This is the detrimental situation in which the Council finds itself by proposing to redistribute housing need to Sherburn in Elmet and the DSVs in general. The Inspector suggested that simply redistributing some of the target intended for Tadcaster to other settlements would not be unsound. However, this comment in paragraph 6 was made in isolation to other considerations, such as the proposed extension to the Plan period and the increase in the housing target. The Inspector also made it clear that the comment was made before any sustainability assessment had been undertaken. It has become apparent that the cumulative effect of the Proposed Changes simply result in a situation where a Green Belt review could be required that goes beyond a 'localised review'.
- 11.10 The only way in which to deal with it is to ensure that the redistribution of Tadcaster's housing need is kept within the northern sub area or else focused on Selby itself. This would require a change to Policy CP2 to increase the housing target for Selby and to identify certain DSVs for a greater proportion of development over others, including Barby, Brayton and Thorpe Willoughby and those in the northern section of the district. In addition, Escrick should be included in the list of DSVs.

12.0 SUSTAINABILITY ASSESSMENT ADDENDUM

- 12.1 The SA includes an assessment of Policy CPXX. The assessment includes a number of criteria, including SA12 which relates to the historic built environment. It should be noted that the SA is deficient as it does not refer to the York Green Belt. The York Green Belt was specifically designated in order to protect the setting of the historic city. The Green Belt around York is therefore important for the protection it provides to the preservation and conservation of the setting to the historic built environment of the City. The SA should make reference to this specific purpose in the assessment of a review of the York Green Belt.
- 12.2 The SA is also deficient as it does not include an assessment of all reasonable alternatives for accommodating housing need arising following the realisation that Tadcaster cannot fulfil its role. This is addressed under section 7 above.
- 12.3 The SA is deficient again in relation to assessing the concept of safeguarding land for future development beyond the Plan period, as set out under section 11 above.
- 12.4 The Core Strategy cannot be found sound until the missing assessments are complete or the corresponding policies or criteria in the Core Strategy are deleted.