

# IAIN BATH PLANNING

LDF Team  
Development Policy  
Selby District Council  
Civic Centre  
Portholme Road  
Selby  
YO8 4SB

**Via Email & Post: [ldf@selby.gov.uk](mailto:ldf@selby.gov.uk)**

21 February 2011

Ref: IGB/tp

Dear Sirs

## **Selby District Local Development Framework Core Strategy Submission Version**

I write further to your letter dated 6 January in relation to the above document and on behalf of a number of clients set out below some comments in relation to the draft Core Strategy document.

I will supplement these comments in due course ahead of the 21 March date in relation to the Site Allocations Development Plan Document with more details relative to specific landholdings within my clients ownership.

### **General Comments**

Paragraph 2.39 – General support is given for the moderation of current commuting patterns and lifestyles by promoting job growth through the Core Strategy and other Local Development Framework Documents in the interests of achieving sustainable development.

Paragraph 2.45 – Again general support is given to the strengthening of the local economy which is one of the principal aims of the Core Strategy document.

The range of objectives referred to are in general terms supported.

### **Housing Development**

In general terms the settlement hierarchy proposed is supported.

Paragraph 4.8 – The acknowledgement that in local service centres such as Sherburn in Elmet there is scope for continued growth and expansion of services although with the provision of additional infrastructure for the police, fire and rescue services, recycling and leisure facilities to support major growth is supported.

Paragraph 4.9 – Support is given for the continued local growth in larger service villages such as Church Fenton and Monk Fryston/Hillam.

Paragraph 4.10 – Support is given for the designation of Church Fenton and Monk Fryston/Hillam as designated service villages capable of accommodating additional limited growth.

Planning Consultancy

Paragraph 4.21 – Support is given for the priority of improving existing services and expanding the range of local employment opportunities in Sherburn in Elmet together with service and infrastructure improvements.

Paragraph 4.25 – Support is given for the limited further growth in designated service villages as appropriate particularly in villages such as Church Fenton and Monk Fryston/Hillam which have a good range of local existing services.

Paragraph 4.26 – Support is given for an appropriate scale of development in the designated service villages on Greenfield land.

Paragraph 4.29 and 4.39 – Support is given for the practical suggestion of reviewing development limits and undertaking localised Green Belt boundary revisions as part of the Allocations Development Plan Document.

Policy CP1 – Support in principal is given for the identified settlement hierarchy.

Paragraph 4.42 – The Council's recognition that there should be some scope for continued growth in the designated service villages to maintain their vitality and viability is supported.

Paragraph 4.47 – Once again support is given for an appropriate scale of development on Greenfield land as reflected in Policy CP1a subject to the conclusion of the development limits and Green Belt boundary reviews being undertaken as part of the Local Development Framework exercise.

Policy CP2 – The requirement for 1,929 dwellings to be accommodated within designated service villages and with a balance of 1,573 dwellings after current commitments are taken into account is generally supported as representing approximately a quarter of the planned growth for the district. In relation to point (d) it is supported that the majority of this requirement should be met in the most sustainable villages which would include Church Fenton and Monk Fryston/Hillam.

## **Economy**

Paragraph 6.9 – Support is given for the need for additional employment space to meet the needs of the modern economy including the diversification into growth areas.

Paragraph 6.11 – Support is given for the focus of employment opportunities on the three main towns together with inward investment as well as indigenous employment growth including the provision of small to medium sized premises and larger premises for logistics and companies with specialist needs/higher value uses. Within this context Sherburn in Elmet should be the focus of such activity.

Paragraph 6.21 to 6.22 – In relation to Sherburn in Elmet the indications that the market will support the provision of additional employment land and premises is supported.

Policy CP9 – Currently the policy indicates between 5 and 10 hectares of new employment allocation within Sherburn in Elmet. It is considered that this level of employment provision within the Local Development Framework document should be increased given the locational and sustainability features of the settlement of Sherburn in Elmet and the indications of market requirements.

Paragraph 6.60 – Support is given for improved infrastructure and facilities in Sherburn in Elmet to sit alongside new growth.

## IAIN BATH PLANNING

I trust these comments will be taken into account as part of progressing the Core Strategy document and I look forward to liaising with the Council in due course once more detailed site specific comments have been submitted over the course of the coming weeks. In the meantime if you require anything further please do not hesitate to contact me.

Yours faithfully

**Iain Bath BA (Hons) MRTPI**

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## Part A

In completing this representation form, you are providing a formal consultation response under Regulation 27 of the Town and Country Planning (Local Development)(England) Regulations 2008 with regard to the Selby District Submission Draft Core Strategy DPD on grounds of soundness only.

Please complete separate copies of Part B (pages 3 and 4) of this form for each section, policy, table, map or diagram about which you wish to comment.

If you believe that a section, policy, paragraph, table, map or diagram is unsound with regard to more than one test of soundness please provide a separate representation for each test.

### The Tests of Soundness

Soundness is explained in PPS12 (Planning Policy Statement 12) in paragraphs 4.36 - 4.47, 4.51 and 4.52 and the boxed text. Specifically paragraph 4.52 states that to be sound a Core Strategy should be:

#### **1 Justified**

PPS12 provides that to be 'justified' a DPD (in this case the 'Core Strategy') needs to be :

- founded on a robust and credible evidence base involving:
  - evidence of participation of the local community and others having a stake in the area
  - research/fact finding - the choices made in the plan are backed up by facts
- the most appropriate strategy when considered against reasonable alternatives

#### **2 Effective**

PPS12 states that Core Strategies should be effective. This means:

- Deliverable - embracing:
  - Sound infrastructure delivery planning
  - Having no regulatory or national planning barriers to delivery
  - Delivery partners who are signed up to it
  - Coherence with the strategies of neighbouring authorities
- Flexible
- Able to be monitored

#### **3 National Policy**

The DPD (in this case the 'Core Strategy') should be consistent with national policy. Where there is a departure, the Local Planning Authority (LPA) must provide clear and convincing reasoning to justify their approach.

**Completed representation forms must be returned to the Council no later than 5pm on Monday 21st February 2011.**

Email to: [ldf@selby.gov.uk](mailto:ldf@selby.gov.uk) (Please save a copy to your computer prior to e-mailing your response)

Post to: LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby YO8 4SB

**Contact Details** (only complete once)

Please provide contact details and agent details, if appointed.

Personal Details	Agents Details (if applicable)
Title	MR .
First Name	IAIN
Last Name	BATH
Job Title (where relevant)	
Organisation	IAIN BATH PLANNING
Address Line 1	DEVONSHIRE HOUSE
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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 3 and 4) to this part of the representation form.

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

**Part B** (please use a separate sheet (pages 3 and 4) for each representation)

Please identify the part of the Core Strategy to which this representation refers:

Section No.	<input type="text"/>	Policy No.	<input type="text"/>	Paragraph No.	<input type="text"/>
Map No.	<input type="text"/>	Figure No.	<input type="text"/>	Other	<input checked="" type="checkbox"/> *

\* PLEASE SEE ATTACHED  
COVER LETTER.

**Question 1: Do you consider the DPD 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 DPD is unsound, please identify which test of soundness your representation relates to:**

(Please note you should complete separate Part B (pages 3 and 4) of this form for each test of soundness 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 Core Strategy DPD 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 DPD, please also use this box to set out your comments.

PLEASE SEE ATTACHED LETTER - IT IS CONSIDERED THAT THE LEVEL OF EMPLOYMENT GROWTH ALLOCATED TO SHERBURN IN ELMET SHOULD BE INCREASED.

**Question 4:** Please provide details of what change(s) you consider necessary to make the Core Strategy DPD 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 ATTACHED LETTER - INCREASE THE LEVEL OF  
EMPLOYMENT ALLOCATION FOR SHERBURN - IN -  
ELMET.  
DISCUSSIONS ON AN APPROPRIATE LEVEL COULD TAKE  
PLACE SUBSEQUENT TO THE SUBMISSION OF SITE  
SPECIFIC COMMENTS TO THE SITE ALLOCATIONS DPD  
WHEN A SITE IN SHERBURN - IN - ELMET WILL BE PUT  
FORWARD FOR CONSIDERATION.

(Continue on a separate sheet if submitting a hard copy)

**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 representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination. For further information on the stages see The Planning Inspectorate website ([http://www.planning-inspectorate.gov.uk/pins/appeals/local\\_dev/index.htm](http://www.planning-inspectorate.gov.uk/pins/appeals/local_dev/index.htm))

**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).

OVERALL EMPLOYMENT LAND PROVISION IS A KEY  
AND STRATEGIC ISSUE OF THE CORE STRATEGY AND  
LDF PROCESS.

**Representation Submission Acknowledgement**

I acknowledge that I am making a formal representation under Regulation 27 of the Town and Country Planning (Local Development)(England) Regulations 2008. 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

2nd February 2011