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**From:** Richard Mowat [rtm@dacres.co.uk]  
**Sent:** 14 February 2012 14:55  
**To:** ldf  
**Subject:** Selby District Local Development Framework (LDF) - Proposed Changes to the Submission Draft Core Strategy  
**Attachments:** Representations to the Submission Draft Core Strategy - February 2012 on Behalf of Redrow Homes Yorkshire and Persimmon Homes Yorkshire.pdf

Sir/Madam,

Good afternoon.

Please find attached representations to the Submission Draft Core Strategy on behalf of our clients Redrow Homes Yorkshire and Persimmon Homes Yorkshire.

Kind regards,

Richard

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16/02/2012

## **Selby District Local Development Framework (LDF): Proposed Changes to the Submission Draft Core Strategy**

### **Part A**

#### **General Policy Response**

##### **1. Soundness and Recent Government Policy**

- 1.1 Our response raises general concerns over "Soundness". We wish to emphasize the need for a balanced approach to the growth of Selby District with appropriate distribution and scale of development in sustainable locations. With regard to the tests of soundness in PPS12, which are explained at paragraph 4.52 of PPS12:

To be "sound" a Core Strategy should be JUSTIFIED, EFFECTIVE and CONSISTENT WITH NATIONAL POLICY.

"Justified" means that the document must be:

- Founded on a robust and credible evidence base.
- The most appropriate strategy when considered against the reasonable alternatives.

"Effective" means that the document must be:

- Deliverable.
- Flexible.
- Able to be monitored.

- 1.2 The planning context for all forms of development is changing with a new statute in the form of the Localism Act, a new draft National Planning Policy Framework (NPPF) (July 2011), and a number of policy statements made by ministers in the context of budgetary statements, challenging economic times and a wish to create economic growth.
- 1.3 The Yorkshire and Humber Plan (adopted May 2008) (RSS) remains part of the Development Plan for Selby District until it is revoked. The RSS adopts a City-region approach to spatial planning unlike its predecessor document the Regional Planning Guidance for the Yorkshire and Humber. It is understood the Yorkshire and Humber Plan will be revoked in the short term

and it is therefore possible that it will no longer be part of the Development Plan when the Selby District Core Strategy is adopted (underlining our emphasis).

- 1.4 The Localism Bill received Royal Assent on the 15<sup>th</sup> November 2011; and now constitutes an Act of Parliament (law). However, although it is the Government's clear policy intention to revoke existing regional strategies outside London, this is subject to the outcome of environmental assessments and any revocation will not be undertaken until the Secretary of State and Parliament have had the opportunity to consider the findings of the assessments.
- 1.5 The status of the Localism Bill as an Act of Parliament does enable more weight to be given to the Government's clear policy intention to revoke the Regional Spatial Strategy. Consequently, the case made on housing market issues does not rely on RSS housing policies or the evidence base for the RSS which is now dated (underlining our emphasis) (e.g. much earlier population and household projections were used in the preparation of the RSS).
- 1.6 At paragraph 12.25 of the RSS reference is made to the policy requirements for a review of the plan to be carried out and completed by 2011 (Part D of Policy H2). Reference is made to the reasons for this review, which was "*to ensure that additional housing growth is planned and accommodated in the most sustainable way*". The national evidence base at the time of RSS adoption (Housing Green Paper 2007, advice from the National Housing and Planning Advice Unit (NHPAU) and the latest household projections (2006 based) were all leading to the conclusion that housing need in the Region was increasing. The review was started in 2008 and abandoned in June 2010 following the election of the Coalition Government. So far it has been left to individual local planning authorities to work on their own LDF Core Strategies and their own assessments of housing requirement and distribution.
- 1.7 In their general approach the Government have given individual planning authorities the ability to determine their own housing requirements but within the context of an established and credible evidence base (underlining our emphasis). The Government is following through the abolition of Regional Spatial Strategies (RSS), via the Localism Act, neighbouring authorities to co-operate with one another wherever necessary in meeting development needs.
- 1.8 The duty to co-operate has yet to be fully embraced, however this will become more and more significant over the coming months if certain Council's within the City Region maintain a stance of not meeting an annual housing requirement which is at least equivalent to or greater than the earlier RSS annual requirement figure as the national projections indicate a higher figure.

- 1.9 The 'direction of travel' of the current Government's policy on housing delivery is now very clear and this represents quite a substantial change on the position which was generally adopted pre, and immediately post election.
- 1.10 The Government's Planning for Growth Statement released in March 2011 now sits at the heart of the new planning system with an unequivocal understanding that the starting point for development decisions will be 'yes' except where this would compromise the key sustainable principles set out in national planning policy. There is now a much clearer realisation and commitment to the need to accelerate the delivery of new homes and to the increased level of housing need.
- 1.11 PPS3 will shortly be replaced by the NPPF which is expected to be approved, possibly with some revisions. A transitional statement is expected in the next couple of weeks and the NPPF is likely to be approved in March/April 2012. The Draft NPPF states:-
- The Government's key housing objective is to increase significantly the delivery of new homes (para. 107).
  - Prepare a Strategic Housing Market Assessment to assess the full housing requirements, working with neighbouring authorities where housing markets cross boundaries (para. 28).
  - Use the Strategic Housing Market Assessment to identify the scale and mix of housing required over the plan period which meets household and population projections taking account of migration and demographic changes (para. 28).
- 1.12 Chapter 2 (Paragraph 1) of the Government's recently published Housing Strategy ("**Laying the Foundations**" – November 2011) states ***"England's population is growing, with the number of households set to keep on rising in years to come. Currently, the number of households in England is projected to grow to 27.5 million in 2033, an increase of 5.8 million (27 per cent) over 2008, or 232,000 households per year"*** The figures for Selby District over the same period are a projected growth of 13,000 households an increase of 39% over the 2008 position or 520 households/year (Source 2008 based Household Projections published in November 2010).
- 1.13 It is clear that sustainable development is a key core principle underpinning both the existing and emerging development plan documents. The Core Strategy needs to have regard to the 'Planning for Growth' agenda, the emerging provisions of the NPPF, the new Housing Strategy and the most up-to-date evidence base in order for it to be a "sound" document.

## **2. Examination in Public of the Selby District Core Strategy**

- 2.1 The Hearing commenced on Tuesday 20 September 2011. Selby District Council secured an adjournment of the Core Strategy Examination in Public, to look again at acknowledged deficiencies in the emerging plan.
- 2.2 Whilst the majority of the document reviewed so far was deemed to be in line with national planning policy and guidance, the Examination in Public has highlighted that more work needed to be done in some areas.
- 2.3 In light of the arguments made by Samuel Smiths Old Brewery (Tadcaster) (SSOBT), which served to reduce the yield estimate for Tadcaster sites available in the medium term (8-17 years) from 1500 potential dwelling to approximately 285 dwellings; the independent Inspector indicated that greater clarity was needed about the Council's green belt policies. There was also considerable debate over whether the Council's ambition to deliver 650 new homes in Tadcaster is deliverable given previous home completion rates in the area; and the Inspector has also identified a difference between the Council's ambition for the total number of new homes in the district compared to the ambition of potential developers and the Government's emerging new National Planning Policy Framework.

## **3. Selby District Council Core Strategy – Key Decision (November 2011)**

- 3.1 This report sets out the Inspector's concerns regarding the "soundness" of the Selby District Core Strategy from the Examination in Public (EIP) which took place in September. It highlights the key issues and officer responses to those concerns, setting out the further work which is being undertaken. As a result of the further work it identifies some initial findings and considers potential implications/options relating to proposed policy changes.
- 3.2 Within the report it was not suggested that there is a change to the preferred strategy set out in the Core Strategy (and as outlined in the Council's Written Statement No.7 for the EIP). That is; the Core Strategy aims to balance sustainability considerations and concentrate growth in Selby, satisfying locally identified housing need, while reflecting physical and other constraints. However, consideration has been given to future housing provision within the settlement hierarchy.

#### 4. ARUP Report

##### **Selby District Council – Scale of Housing Growth in Selby – Final Report (November 2011)**

4.1 To inform the provisions of the Core Strategy going forward; SDC commissioned ARUP to produce a report, which considered the evidence on the appropriate levels of population and housing growth that should be identified in the Selby Core Strategy. It has assessed whether the housing growth requirements set out in the RSS are still appropriate in light of the available evidence on population and household projections, housing markets and the economy.

4.2 The report looks at the following key issues (see below), each will be addressed accordingly:-

- Recent Evidence on Population, Migration and Household Growth;
- Cross-Boundary Issues; and,
- Recent Evidence on Deliverability of Housing Growth.

##### **Recent Evidence on Population, Migration and Household Growth**

4.3 The ARUP report makes a number of statements on Pages i and ii each of which are considered below:-

4.4 **Issue 1** – *“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”*

4.5 We **OBJECT** to this particular statement. Firstly, the Local Authority's attention is drawn to the provisions of PPS3 (Paragraph 33) which states *“that in determining the level of housing provision, LPAs should take account of evidence of current and future levels of need and demand for housing and affordability levels having regard to:-*

- *Evidence on need and demand taken from the SHMA.*
- *Government's latest published household projections and the needs of the regional economy.”*

- 4.6 The importance of the provisions raised in PPS3: Paragraph 33, are supported by DCLG Minister Baroness Hanham in her House of Lords written answer (October 2011) (Appendix 2) which states:-

*"When assessing their housing requirements in future years as part of a strategic housing market assessment, authorities should use the most recently released sub-national population projections (published by the Office for National Statistics) and household projections (published by the Department for Communities and Local Government)"*

- 4.7 Whilst it is recognised that the RSS is to be eventually abolished and replaced with a more locally derived target, it must also be recognised that replacement local targets are to be evidence based and in particular based upon evidence of household growth from official projections. There is no clear justification or reasonable case (underlining our emphasis) for Selby District Council (SDC) to use the 2004 based household projections.

- 4.8 **Issue 2** – we *"conclude that the most recent 2008 based CLG household projections do not provide the robust basis for identifying housing growth requirements in Selby District. The 2008 based projections are for 550 net additional dwellings per annum. The trends proceeding 2008 were of strong economic growth and substantial net international migration. More recent economic and migration trends have been very different and likely future trends are very different as a result of the recession and the forecasts of a slow recovery"*

- 4.9 We **OBJECT** to this particular statement. With respect to the requirements of PPS3 and DCLG Minister Baroness Hanham, it is clear that Selby District Council should be using the most recent household public projections (2008 based household projections) which identify a much higher housing growth target for Selby of 550 dwellings per annum. This requirement is more up-to-date than the RSS target which was based on the 2002/2003 ONS population projections and CLG household formation forecasts and partially based upon 1996 headship rates.

- 4.10 We **OBJECT** to the assumption that migration trends have been very different and no specific reference to an ever increasing population. With respect to our concerns, we refer to a press release by Migration Watch on the 8<sup>th</sup> February 2012 stated:-

*"The latest population projections – which assume migration of 200,000 a year – show that our population will reach 70 million in just 16 years and two thirds of that increase will be as a result of immigration. Those are the bare numbers. What it means is that we will have to find*

*jobs, homes, school places hospital beds and transport capacity for the equivalent of an extra seven cities the size of Birmingham in just sixteen years"*

4.11 The following key facts have also recently been made public by Migration Watch.

- *Net immigration quadrupled to nearly 200,000 a year between 1997 and 2009. In 2010 it was 239,000. Over 3 million immigrants have arrived since 1997.*
- *Migrants arrive almost every minute; they leave at just over half that rate.*
- *A new home must be built every seven minutes for new migrants.*
- *England is already, with the Netherlands, the most crowded country in Europe*
- *The population of the UK will grow by over 7 million to 70 million in the next 16 years, 5 million due to immigration - that is 5 times the population of Birmingham.*

4.12 This evidence, along with the provisions of the Housing Strategy (see Paragraph 1.12 above) is compelling. 450 net annual additions to the existing housing stock is not only 100 units per year below the most recent ONS forecasts, but will result in a considerable housing shortfall going forward. There is a clear requirement for SDC to increase net annual additions to the housing stock to 550 dwellings and make allowances for increased numbers within the emerging Site Allocations Document.

4.13 The demand for market housing is strongly influenced by demand for the in-migrant households which accounts for around 33% of annual market demand. These net household migrations to Selby District are particularly evident in Figure 3.1 of the SHMA 2009, which shows a net increase of approximately 4100 from Leeds and York between 2000 and 2007.

4.14 **Issue 3** – *"In reaching this conclusion we are mindful that PPS3 states that Local Planning Authorities should take into account the "Government's latest published household projections and the needs of the regional economy, having regard to the economic growth forecasts." Our view is that most recent forecasts (including those from the Yorkshire and Humber Regional Econometric Model, which indicate a slow recovery to pre-recession levels of employment and economic growth, mean there is a reasonable case for not using the 2008 based forecast."*

4.15 We **OBJECT** to this conclusion. Employment and economic growth will take time to get back to pre-recession levels, however, through new statutes and planning policies the Government



has clearly established its 'direction to growth' to which SDC's overall approach is contrary. By establishing a historic evidence base SDC is undermining both the provisions of PPS3 and the emerging NPPF, the latter of which seeks to increase significantly the delivery of new houses.

- 4.16 **Issue 4** - *"this view is supported by the fact that the North Yorkshire Strategic Housing Market Assessment produced recently (September 2011) sets out a scenario for Selby based on up-to-date economic forecasts of only 403 net additional dwellings per annum, even using 2008-based household projections."*
- 4.17 As established in Paragraph 1.11 above, the NPPF will also require SDC to prepare a Strategic Housing Market Assessment which will assess the full housing (including scale and mix) requirements for the district.
- 4.18 It was identified in our submissions to the Selby Core Strategy EIP (September 2011) that although the accuracy of all housing projections and trajectories is open to a certain level of debate and scrutiny, the SHMA meets all the process criteria presented in SHMA Practice Guidance Version 2 and is considered to be credible and robust.
- 4.19 In this instance both the Selby SHMA (2009) and the North Yorkshire SHMA (GVA – 2011) have been used to inform the findings of the ARUP report.
- 4.20 Table 5.1 of the SHMA 2009 and the accompanying text in paragraphs 5.21 and 6.9 indicates that there is an annual requirement for 1,119 dwellings of which 710 (63.4%) is for market housing and 409 (36.6%) is for affordable housing and includes a provision of housing to cater for the existing backlog (underling our emphasis).
- 4.21 Section 7 of the North Yorkshire SHMA report considers the structural drivers of change (economic and demographic trends) and the implications of these for maintaining a balanced housing market. The analysis for Selby is clearly set out within Paragraphs 6.13 to 6.31. Interestingly, the ARUP report assesses the robustness of Scenario 3, which has used 2008 population and household projections and has modelled them to take into account the impact of economic conditions and the most recent economic forecasts on growth and change and has used it to partly justify the provision of only 450 net dwellings per annum.
- 4.22 We **OBJECT** to this approach. This approach does not take into consideration the Government's 'direction of growth' and would fail to address the issues such as housing

backlog (through a historic under provision) (see Para's 5.18 and 5.19 of the Selby SHMA), and an increasing population or increased migration.

- 4.23 **Issue 5** – *“evidence of 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.”*
- 4.24 We **OBJECT** to this approach. Via the Localism Act, neighbouring authorities are required to co-operate with one another wherever necessary in meeting development needs. SDC are not in a position to opt out and therefore will need to consult with neighbouring districts.
- 4.25 The neighbouring West Yorkshire authorities such as Leeds and Wakefield are making steps to adopt the requirements of the most recent ONS forecasts and are looking to increase the amount of deliverable land over time. By not basing their Core Strategy on the most up-to-date evidence base, SDC will actually encourage increased migration from Selby to neighbouring authorities as housing supply fails to meet demand. This subsequently encourages high levels of commuting and can impact upon the economic viability of the district and the economic self containment sought through the Core Strategy. The City of York Council, Harrogate Borough Council and the East Riding of Yorkshire Council continue to plan for less housing than the ONS forecast.
- 4.26 Contrary to the struggling employment markets within the LCR; parts of Selby District are currently seeing significant economic growth. Sherburn Enterprise Park represents one of Selby District's biggest employment opportunities; it has attracted major food and packaging companies such as Supercook, Linpac, Constar, Cromwell Polythene and more recently (May/June 2011) Safa International, Sainsbury's (800 jobs), Debenhams (800 jobs), Optare plc (400 jobs) and DHL Supply Chain (350 jobs).
- 4.27 It must also be noted that the agents for Sherburn Distribution Park 'Evander Properties' are actively promoting the three remaining distribution units. Details of which can be viewed at <http://www.evanderproperties.com/sherburn/>. The units range in size from 189,965ft<sup>2</sup> to 330,401ft<sup>2</sup> and offer a range of ancillary features. In terms of jobs the remaining buildings when fully occupied will be capable of providing circa 1000 jobs.

- 4.28 We are currently not satisfied that the proposed housing projections meet the requirements of any additional people employed in the area, as this will hinder migration and promotes unsustainable travel practices.
- 4.29 **Issue 6** – *“the recent evidence on house prices is that housing market trends in Selby District are broadly in line with neighbouring authorities. There is some evidence that there is a stronger market for market housing at the lower end of the market. However average house prices in Selby District are still falling. The evidence is that any housing market recovery is likely to be weak in the next few years. Depending on the most recent evidence on the deliverability of housing land, there may be a case for planning for a slightly lower level of housing growth in the first five years of the plan, with this compensated for by slightly higher levels of housing growth thereafter”.*
- 4.30 We **OBJECT** to this approach. We reiterate our argument as set out in Issue 1. The Governments ‘direction of growth’ is clear. If the Inspector considered such an approach to be acceptable, the calculation should still be based on achieving an average of 550 net additional dwelling per year over the lifespan of the Core Strategy.

## 5. Response to Proposed Changes to the SDCS

### CP2 Scale and Distribution

- 5.1 This policy sets out the broad target of dwellings required over the plan period taking into account existing commitment and establishing the broad distribution between the settlement hierarchy.
- 5.2 Policy CP2 is proposed to be revised in order to take account of:
- 450 dpa target – we **OBJECT** to this revision. With respect to the requirements of PPS3 and DCLG Minister Baroness Hanham, it is clear that Selby District Council should be using the most recent household projections (2008 based household projections) which identify a much higher housing growth target for Selby of 550 dwellings per annum. This requirement is more up-to-date than the RSS target which was based on the 2002/2003 ONS population projections and CLG household formation forecasts and partially based upon 1996 headship rates.
  - Phasing of the requirement – we **OBJECT** and reiterate our argument set out within Issue 1 and Paragraph 4.30 above.

- Amended splits between the two Local Service Centres – we **SUPPORT** the proposed percentage split (%) (underlining our emphasis) between Sherburn in Elmet and Tadcaster as set out in Figure 3 of the Addendum to Background Paper No.3.
- Update base-date of planning permissions to 2011 – We **SUPPORT** this approach.
- Amend plan period to 2027 (to take account of the revised expected date of adoption of 2012) – we **RAISE CONCERNS** that the Core Strategy timescales will not be run concurrently with the Site Allocations DPD and would therefore recommend that it is extended to 2029.

### **CP3 Managing Housing Land Supply**

5.3 Revisions to Policy CP3 are set out on Page 36 of the 'Composite Schedule of all Proposed Changes'. The revised Policy is set out below and the key issues assessed.

5.4 **Part A** of Policy CP3 states *"The Council will ensure the provision of housing is broadly in line with the annual housing target and distribution under Policy CP2 by:*

1. *monitoring the delivery of housing across the District.*
2. *identifying land supply issues which are causing or which may result in significant under-delivery of performance and or which threaten the achievement of the Vision, Aims and Objectives of the Core Strategy.*
3. *investigating necessary remedial action to tackle underperformance of housing delivery."*

5.5 We **OBJECT** to the revised CP3 on the basis that the annual housing target has been established at 450 and not 550 in line with the most recent ONS forecast. We are in general **SUPPORT** of points 1, 2 and 3, however we would seek to ensure that the 'monitoring', 'identification' and 'investigative' process is iterative in its design resulting in it being pro-active rather than re-active.

5.6 **Part B** of Policy CP3 states *"Under-performance is defined as:*

1. *Delivery which falls short of the quantum expected in the annual target over a continuous 3 year period; or*

2. *Delivery which does not accord with the distribution specified in Policy CP2 with particular emphasis on delivery in the Principal Town and Local Service Centres over a continuous 3 year period; or*
3. *Situation in which the housing land supply is less than the required Supply Period as defined by the latest Government policy"*

5.7 We **SUPPORT** these definitions.

5.8 **Part C** of Policy CP3 states "Remedial action is defined as investigating the underlying causes and identifying options to facilitate delivery of allocated sites in the Site Allocations DPD by (but not limited to):

1. arbitration, negotiation and facilitation between key players in the development industry; or
2. facilitating land assembly by assisting the finding of alternative sites for existing users; or
3. identifying possible methods of establishing funding to facilitate development; or
4. identifying opportunities for the use of statutory powers as Compulsory Purchase Orders.

5.9 We **SUPPORT** the approach as set out in Part C; however we have **RESERVATIONS** with respect to SDC actually foreseeing the need for such intervention and having the physical and financial resources to undertake such work. In order to manage any potential shortfall through the non delivery of sites identified in the Site Allocation DPD, Part C of Policy CP3 should be more specific. However, 'but not limited too' is very ambiguous and provides an element of uncertainty, which in our view should not form any part of a Core Strategy. It is our view that Policy CP3 should be expanded to specifically identify a range of sites that would also be considered if a significant shortfall in deliverable sites was identified.

5.10 In the event that SDC are unable to demonstrate very special circumstances for re-aligning the Green Belt boundaries in Tadcaster, more sustainable Green Belt sites elsewhere in the district should also be assessed, before entering into potentially expensive mediation programmes.

5.11 **Part D** of Policy states that "*in advance of the SADPD being adopted, those allocated site identified in saved Policy H2 of the Selby District Local Plan will contribute to the housing land supply.*"

- 5.12 We **SUPPORT** this approach. However, the actions and decisions made by SDC on this issue have been confusing and will need clarifying/justifying during the EIP.
- 5.13 In an Executive Report to Committee (13<sup>th</sup> September 2011), SDC published its response to a consultation on the 'Site Allocations Development Plan Document Preferred Options stage - and other Local Development Framework documents'. It was made clear that in light of a five year housing supply shortfall, SDC would be releasing a number of Phase 2 sites (identified in Policy H2 of the Selby District Local Plan) as part the Sites Allocation Document.
- 5.14 At Paragraph 2.24 SDC states *"SHB/1B is a large site with a capacity of 900+ dwellings in the SDLP. The Submission Draft Core Strategy requirement from new allocations in Sherburn in Elmet is less than 500 dwellings. Bringing this site forward at this interim stage could prejudice decisions to be made through the SADPD (the site is identified in the emerging Preferred Options SADPD, site reference SHER007). The Executive considered this issue and agreed that the site should be released, albeit at a lower level than that set out in the SDLP."* (underlining our emphasis)
- 5.15 For the Inspectors information the SHB/1B was released for the future provision of 282 dwellings.
- 5.16 The Inspector will recall from our July 2011 submission (see Paragraph 1.3 Informative) that it was the intention of our clients to submit an outline planning application and accompanying Environmental Impact Assessment (EIA) for the construction of 498 dwellings on an allocated Phase 2 site. This application (2011/0893/EIA) was refused by SDC on the 2nd February 2012 for the following reasons:-
- Reason 1** - *"The proposal, by virtue of the number of units proposed, is contrary to the "Selby District Council Position Statement, Release of Selby District Local Plan Phase 2 Sites (September 2011)" and Policy H2A "Managing the release of Housing Land" of the Selby District Local Plan (2005) and therefore would undermine the Council's strategy for the controlled release of housing land."*
- Reason 2** - *"The submitted Master Plan and Landscape Master Plan which accompany the application by virtue that they do not include a link to the land off Carousel Walk/Fairfield Link would prejudice the comprehensive development of the SHB/1B Allocation and would therefore fail to ensure the efficient and effective development of the wider allocation contrary to Paragraph 69 of Planning Policy Statement 3: Housing"*
- 5.17 The Inspector will note that whilst the provisions of the Executive Report and Reason 1 clearly seek a controlled release of housing land on the SHB/1B site; Reason 2 then suggest that the proposed development would prejudice the comprehensive development of the wider

allocation. SDC is promoting two contradictory approaches and in order for us to fully **SUPPORT** Part D of Policy CP3 some clarity is required.

#### **Policy CPXX Green Belt**

- 5.18 To ensure the Green Belt boundaries endure in the long term, we would **SUPPORT** a review of the Green Belt through a lower order DPD.
- 5.19 At the September EIP it became clear that the residential yield for Tadcaster would be significantly lower than that anticipated by SDC. This led SDC to conclude that a review of the Green Belt in Tadcaster was necessary. In this point, the Inspector made it clear that it would not be sufficient to simply say that *"...because there is sufficient land available just outside the Green Belt around Tadcaster to meet the identified scale of growth, Green belt releases are justified."* In addition, he stated that SDC would need to present a compelling case for the level of growth proposed for Tadcaster, whilst also demonstrating that other land elsewhere across the District should be significantly less sustainable. The EIP was suspended to allow further work to be carried out by SDC to address acknowledged deficiencies in the new plan.
- 5.20 The housing strategy of SDC is based on identifying sustainable locations within the settlement hierarchy; with new residential development focusing on Selby as the Principal Town, followed by Sherburn and Tadcaster, as the two Local Service Centres before allocating land in Designated Service Villages such as Fairburn.
- 5.21 The establishment of new boundaries and the willingness of SDC to consider and other sustainable sites already located within the Green Belt are commended. The latter will become important in the event that SDC are unable to demonstrate the 'very special circumstances' needed to bring land out of the Green Belt around Tadcaster. Designated Service Villages such as Fairburn, where the deliverability, availability and suitability of Green Belt sites have been actively promoted, and which are located close to existing development limits, may form suitable alternatives or additions to the overall requirement.