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Selby
North Yorkshire
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By email
ldf@selby.gov.uk

19 July 2012

let.044.CB.AM.11700001

Dear Sirs

FURTHER PROPOSED CHANGES (6TH SET) TO THE SUBMISSION DRAFT CORE STRATEGY

We enclose our comments relating to the 6th set of Proposed Changes to the Selby Core Strategy. Our comments are submitted on behalf of Connaught Consultancy LLP. Connaught own land at Hodgson's Lane, Sherburn in Elmet and we have represented them in respect of the Selby Core Strategy and the on-going Examination. This letter should be read in conjunction with our previously submitted representations.

Our comments are as follows:

Policy LP1 – PC6.18

We support the inclusion of a policy which sets out the presumption in favour of sustainable development to demonstrate consistency with the National Planning Policy Framework and the requirement at Paragraph 15 to have clear policies that will guide how the presumption should be applied locally.

Policy CPXX - PC.20

Policy CPXX, Part E and the text at paragraph 4.39g, state the exceptional circumstances for taking land out of the Green Belt are *'where there is an overriding need to accommodate what would otherwise be inappropriate development, which cannot be met else where or where Green Belt land offers the most sustainable option'* (our emphasis).

We object to the Proposed Change from 'and' to 'or' which results in loss of Green Belt land being justified by one or the other of the exceptions. Given the importance attached to the aims and permanence of Green Belts in NPPF, we suggest that both tests need to be met and this change is removed.

PC6.35

The text at paragraph 5.17 comprising Proposed Change reference PC.6.35 and PC5.14 and the pie chart at Figure 8 need to be amended to reflect the

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distribution of housing set out in Policy CP2.

Policy CP2 refers to a percentage split between Sherburn and Tadcaster of 11% and 7% retrospectively as proposed in the 5th set of Proposed Changes and debated at the April Examination.

As such, the change in the distribution of housing in Policy CP2 needs to be followed throughout the document to be consistent and provide a robust strategy.

PC6.39

Proposed Change PC6.39 at paragraph 5.28 confirms that windfalls will not form part of the housing delivery and that the Council will allocate sufficient land to deliver the housing requirement set out in Policy CP2 through the plan period. We support this approach and support confirmation in the supporting text that any windfalls will simply add to the overall housing completions.

Policy CP2

We support the direction of change to the distribution of housing in Policy CP2 and the move towards greater provision of housing in Sherburn as set out in our previous representations based on the sustainability of the village, availability of suitable sites and given the constraints in Tadcaster.

However, we maintain our position that the distribution of housing to Sherburn should be increased further.

Circumstances have changed since the April 2012 Examination and our previously submitted representations providing further evidence to support increased provision to Sherburn.

Three applications are currently pending determination with the Council (application references: 2012/0399/EIA, 2012/0400/EIA and 2012/0468/EIA) and propose a combined total of 700 dwellings in Sherburn, the current allocation proposed in Policy CP2.

Our client is promoting land to the east of Hodgson's Lane combining sites SHLAA ref. PHS/58/003 and PHS/58/023 (see enclosed Site Location Plan). We are now taking steps to prepare an application for the two sites on behalf of the landowners for a minimum of 200 dwellings as proposed in the Preferred Options Site Allocations DPD (September 2011).

The Hodgson's Lane proposals, together with the currently pending applications, would significantly boost local housing supply and deliver community facilities and infrastructure to Sherburn enhancing the sustainability of the settlement and addressing feedback from the local community about desired infrastructure.

Given the above, we suggest that the Core Strategy should allocate greater

provision of housing to Sherburn so as not to restrict sustainable growth in the settlement. This carries even greater weight when considered alongside the deliverability issues in Tadcaster and should be addressed in order that the overall housing target for the borough is met.

We maintain our position set out in previous representations that the overall housing target should also be increased to reflect the latest evidence base including the latest published population projections. The Council should be seeking to plan positively and promote policies to deliver increased levels of housing with built in flexibility to be consistent with policy in the NPPF. The annual housing target should promote growth and not impose restrictions where sustainable development could otherwise be delivered which is the case under the current provision rate.

We suggest the Council should at the very least make reference to the 'New Allocations' as a minimum as well as the overall requirement to enable consideration of an increased number of sites if they are sustainable and do not conflict with other policies in the plan.

We object to the phasing included at Part A of Policy CP2. This conflicts with Proposed Change PC6.40 and the Explanatory Notes which explains that text referring to phasing has been removed as it could be viewed as restrictive. We understand this is an error and the Council intend to remove any reference to phasing from the policy.

Policy CP3 – PC6.51

Proposed Change PC6.51 introduces a 'Plan B' for the delivery of new housing in Tadcaster during the plan period.

PC6.51 introduces the future allocation of three phases of development in Tadcaster. The release of Phase 2 and 3 will be triggered by lack of delivery in earlier phases as an attempt to ensure sufficient delivery over the plan period given known constraints.

This approach does assist in addressing issues in Tadcaster by providing surplus and phased land. However, there remain questions about delivery, particularly in the short term, despite the introduction of phased remedial action, meaning the policy is unsound.

Evidence in the SHLAA (March 2012), and evidence heard at the Examinations, highlight continued concerns about deliverability in Tadcaster.

In the SHLAA, only three sites are considered deliverable in the 0-5 year time period, of which two have historically not delivered, despite having planning permission.

With the exception of site PHS/73/020, all other sites are either unavailable during this plan period (+16 years), or are in the Green Belt and so their deliverability is subject to the findings of a future Green Belt Review.

Site PHS/73/020 has been put forward as part of the Council's call for sites for the SHLAA in November 2011. It is estimated to have capacity for 541 dwellings and to be deliverable in the 0-5 year period.

Whilst this site could potentially meet the housing requirement currently proposed for Tadcaster, if the Council end up reliant on this site alone and any constraints emerged (land ownership, environmental, etc), housing delivery in Tadcaster could fall short of the overall requirement and would then impact on housing delivery targets across the whole of the borough.

To make the policy sound, we suggest that land in other sustainable locations should be taken into consideration as an alternative. This could be done by either allocating higher levels of provision to other settlements where there is known available and deliverable land being promoted for development (i.e. Sherburn), and/or land in Sherburn could be allocated as a reserve should enough land in Tadcaster not be deliverable to meet overall housing targets both in the short and longer term. This could form a further criteria of Policy CP3. Including both changes would improve deliverability and flexibility of the strategy.

Additional Comments

Throughout the document there are references to the now superseded Planning Policy Statements and Guidance Notes. Where references to national planning policy is necessary, this should be to the relevant sections of NPPF and demonstrate consistency with NPPF in order to be sound.

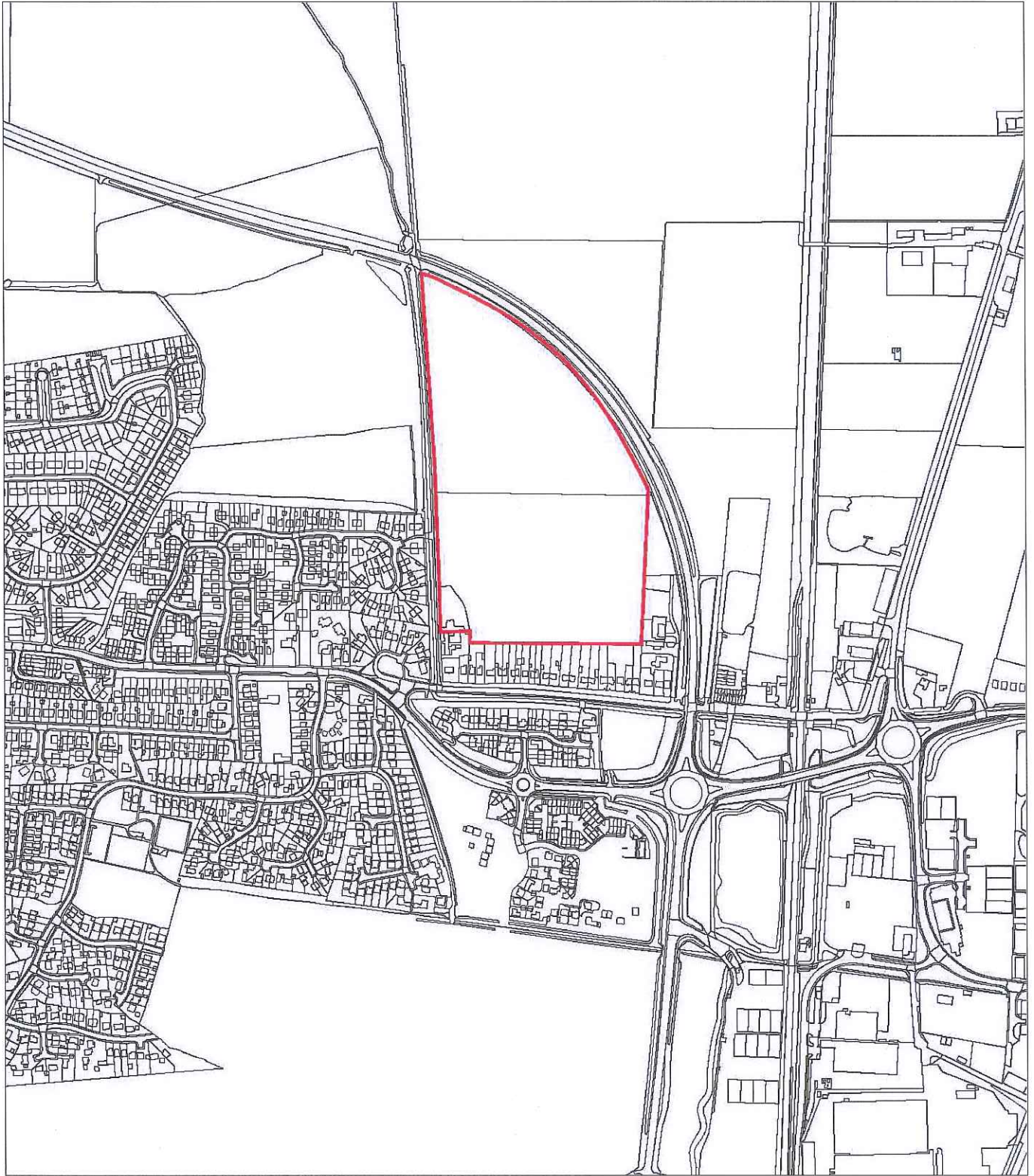
We trust our comments will be taken into consideration.

Yours faithfully

A black rectangular redaction box covering the signature of Charlotte Blinkhorn.

Charlotte Blinkhorn

Enc: Site Location Plan
cc: Connaught Consultancy LLP



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Project Land east of Hodgson's Lane, Sherburn	LPA Selby DC	Indigo Planning Limited Lowry House 17 Marble Street Manchester M2 3AW	
Title Site Location Plan	Date: July 2012 Project No: 11700001 Drawing No: 11700001/002	T 0161 836 6910 F 0161 836 6911 info@indigoPlanning.com	
Client Connaught Land Limited	Drawn by: KN Scale NTS		
KEY  XX			