Cheryl Atkinson

From: Mark Eagland <mark.eagland@peacockandsmith.co.uk>

Sent: 10 August 2015 21:38

To: LDF

Subject: Plan Selby Summer 2015 Consultation - Comments by KCS Development

Dear Sir/Madam,

I have been instructed by my client, KCS Development to review the various documents that the Council has published as part of the Plan Selby Summer Consultation.

Accordingly, I would like to make the following selective comments:

Countryside Gap Study

Q5(C) Do You Have Any Comments On The Selby And Brayton SCG?

KCS Development strongly supports the retention of the Selby and Brayton SCG as set out in the adopted Local Plan. Given the housing growth anticipated in Selby and Brayton over the plan period, there is significant pressure for development in this part of the District, and as the open gap that maintains the separation of the built up areas of these two settlements is narrow my client considers that there is a real risk of coalescence over the plan period. There is no Green Belt to prevent such coalescence from occurring, and therefore KCS Development considers that the SCG performs an essential role in the maintainenance of the distinct identities of Selby and Brayton. Without the SCG the gap between Selby and Brayton would be particularly vulnerable to windfall development proposals during the plan period should the District be unable to demonstrate a 5 year supply of deliverable housing sites, as development plan policies for the supply of housing would be deemed out of date.

Draft Method Statement for Site Allocations: A Framework for Site Selection

Q9 (SS) Do You Have Any Comments On The Overall Approach To The Site Selection Process Set Out At Section 6.3 Of The Study?

KCS Development considers that in respect of the Qualitative Assessment and Officer Judgement phase proposed at Stage 3, the Council should provide a reasonable opportunity for promoters of sites to supply the Authority with technical reports or other relevant supporting information, as there may be circumstances where the site promoter will be well placed to assist with the technical matters that are listed. Whilst it is appreciated that the Council will have a significant number of sites to consider, there should also be provision for a site promoter to seek a revised traffic light score on non-subjective issues if technical evidence can be produced that demonstrates that the assessment that has been carried out is factually incorrect.

Draft Growth Options for Designated Service Villages

Q10 (DSV) Appendix B Of The Study Provides A Settlement Profile For Each Designated Service Village, Including Environmental And Heritage Designations. Is There Any Information That Is Incorrect Or Missing From These Settlement Profile Summaries?

KCS Development notes that the site size and potential capacity for Brayton 18 is incorrect. The correct entries are set out in the 2015 SHLAA that the Council is including as part of the Plan Selby Summer Consultation.

Q11 (DSV) If You Had The Choice, Let Us Know Which Option For Growth Of The Designated Service Villages You Would Choose?

KCS Development considers that Option 3 is the most appropriate option to pursue, since it reduces the need to release Green Belt for housing. There are many opportunities to deliver modest and sustainable extension of DSVs without the need to utilise Green Belt. Given the weight given to preservation of the Green Belt in national policy, and the need to demonstrate exceptional circumstances before such land is released for development, then we are of the view that such opportunities should be thoroughly explored – indeed, there is a compelling argument for an even greater amount of development to be directed to DSVs for this very reason.

I trust that you will take the above comments into account before finalising the evidence base for Plan Selby. Should you have any queries, then please do not hesitate to contact me.

Yours faithfully

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