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ryan king

From: John Pearce [John.Pearce@bartonwillmore.co.uk]
Sent: 13 February 2012 12:41
To: ldf
Cc: Mark Sitch; Daniel Hatcher
Subject: Representations to Proposed Changes on behalf of the Church Commissioners (19099/A3)
Attachments: 120209 Rep Form re 5.26.pdf; 120209 Rep Form re 5.30.pdf; 120213 Core Strategy Proposed Changes reps to Helen Gregory EMAIL.pdf

Dear Sir or Madam

Please find attached representations and completed representation forms submitted on behalf of the Church Commissioners to the Proposed Changes to the Selby District Submission Draft Core Strategy.

We would be grateful if you could confirm receipt by pressing the 'Read Receipt' request.

A hard copy of our submission will follow in the post.

Should you have any questions please do not hesitate to contact me.

Regards

John Pearce
Senior Planner

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Selby District Submission Draft Core Strategy

Consultation on Proposed Changes

January 2012

Representation Form

Planning and Compulsory Purchase Act (2004), Town and Country Planning (Local Development) (England) Regulations 2004 and (Amendment) Regulations 2008 and 2009

Part A

An Examination in Public into the soundness of the Submission Draft Core Strategy (SDCS) was held between 20 and 30 September 2011 in front of an Independent Inspector.

The examination has been suspended to allow the Council to address the following three topics, as set out in the Inspector's Ruling:

- (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.

The Council is now carrying out a consultation directly with participants on the changes to the Core Strategy arising from its consideration of these three topics.

Subject to the outstanding matters above, the examination into the other "Matters and Issues" identified by the Inspector has been completed. All parties have had the opportunity to participate in the hearing sessions and the Inspector has the information necessary to enable him to prepare his report. Consequently no further evidence should be submitted to the examination at this stage; any further evidence received by the Programme Officer is likely to be returned.

When the examination resumes, hearing sessions will be arranged which will focus solely on the above matters. As already stated, the suspension should not be used as an opportunity to revisit matters which have been fully considered during the September 2011 hearing sessions.

Representations are therefore invited as part of this consultation on the Proposed Changes to the Submission Draft Core Strategy.

Please complete separate copies of Part B of this form for each of your separate points. It would be helpful if you could focus on the "tests of soundness" and indicate if you are objecting on a legal compliance issue.

Completed representation forms must be returned to the Council no later than 5pm on Wednesday 15 February 2012

Email to: ldf@selby.gov.uk

Fax to: 01757 292229

Post to: Policy Team, Selby District Council, Civic Centre, Doncaster Road, Selby YO8 9FT

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.

Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

Personal Details	Agents Details (if applicable)
Title	MR
First Name	DANIEL
Last Name	HATCHER
Job Title (where relevant)	ASSOCIATE
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Address Line 2	PRINCE'S GATE
Address Line 3	4 HOMER ROAD, SOLIHULL
County	
Postcode	B91 3QQ
Telephone No.	0121 711 5151
Email address	DANIEL.HATCHER@BARTONWILLMORE.CO.UK

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.

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;
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Please state the specific Proposed Change number: **PC**

(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.)

2.1 Justified

(Please identify just one test for this representation)

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 ATTACHED.

(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.

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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).

WE PREVIOUSLY ATTENDED EXAMINATION HEARING SESSIONS ON THE AMOUNT AND DISTRIBUTION OF HOUSING FOR THE DISTRICT AND WISH TO BE INVOLVED IN THE CONCLUSION OF THE DISCUSSION ON THE MATTERS.

(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

/02/2012

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Signed

Dated

/02/2012

Helen Gregory
Planning Policy Officer
Selby District Council
Civic Centre
Doncaster Road
Selby
YO8 9FT

BY EMAIL AND POST (ldf@selby.gov.uk)

19099/A3/JP/ac

13th February 2012

Dear Ms Gregory

SELBY DISTRICT LOCAL DEVELOPMENT FRAMEWORK
PROPOSED CHANGES TO THE SUBMISSION DRAFT CORE STRATEGY
RESPONSE ON BEHALF OF THE CHURCH COMMISSIONERS FOR ENGLAND

Thank you for your letter dated 19th December 2011 inviting comments on the Proposed Changes to the Submission Draft Core Strategy. We are instructed by our Client, the Church Commissioners for England, to submit a response to these having previously submitted representations to the Submission Version along with earlier drafts of the Core Strategy. We also attended various Hearing Sessions at the Examination in Public of the Core Strategy. Having now reviewed the Proposed Changes and the updated evidence base documents we set out comments below.

Our representations should be read in the context of the land that the Commissioners are promoting for residential development in Brayton, which is identified as a 'Designated Service Village' (DSV) in the Core Strategy Submission Version.

i) The Strategic Approach to Green Belt Releases

We have no comments on the proposed changes.

ii) The Scale of Housing and Employment Development Proposed for Tadcaster and the Implications for the Green Belt

We do not object to the proposed proportion of new housing for the District that is to be directed to Tadcaster as set out in the revised Policy CP2. Notwithstanding this and in light of our comments below, we note that if a higher overall housing figure for the District is ultimately required to be provided, we query whether Tadcaster would be able to accommodate a greater quantum of housing than is currently envisaged for the town. As it currently stands land in the Green Belt will be required to meet the housing and employment needs for the town, and this would only be exacerbated if more housing needed to be accommodated in the town.



If additional housing has to be found across the District, we contend that this should be directed to the other main settlements including the more sustainable DSVs such as Brayton, which are less constrained by land ownership issues and the Green Belt. In seeking to distribute any additional housing across the District, we do not feel that this would be contrary to the overall spatial strategy set out in the Core Strategy and could result in less pressure to remove land from the Green Belt around Tadcaster.

iii) The Overall Scale of Housing Development over the Plan Period

The proposed change to Policy CP2 seeks to increase the annual number of dwellings to be provided in the District from 440 to 450pa. This increase has been recommended following the work completed by Arup and published by the Council in November 2011 in the 'Scale of Housing Growth in Selby' report, following the Inspector's decision to suspend the Examination. It would result in the Council having to allocate sufficient land to provide for a target of 5,340 dwellings in the period up to 2027. In arriving at this increase from 440 to 450 dwellings per annum, Arup concluded that the 2004 based CLG household projections provided the most robust and appropriate basis for identifying future housing growth in the District, notwithstanding that more up to date (2008) household projections are available.

We object to this approach, noting that the more up to date evidence on the level of housing required for the District is set out in the North Yorkshire Strategic Housing Market Assessment (2011) (SHMA) which has been calculated using the 2008 based CLG household projections and identifies an annual net requirement of 520 additional dwellings. We believe that the more up to date figures provide a more robust assessment of the level of housing that would be required within Selby over the next 15 years and as such it is these that should be used rather than 2004 figures. The issue of whether the most up to date household projections should be used was addressed by Baroness Hanham (The Parliamentary Under-Secretary of State, Department for Communities and Local Government) following a question in Parliament on 25th October 2011, who stated that:

'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).'^[1]

Furthermore, PPS3 states at paragraph 33 that in determining local, sub-regional and regional levels of housing local planning authorities should take into account:

"- The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts."

In seeking to justify the revised housing figures proposed based on the 2004 household projections in the 'Scale of Housing Growth in Selby Final Report', the Council make the case that the draft National Planning Policy Framework (NPPF) no longer requires local planning authorities to use the latest published household projections. We disagree with this statement noting that the NPPF at paragraph 28 states:

"The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to require over the plan period which:
- Meets household and population projections, taking account of migration and demographic change."

Whilst paragraph 27 of the NPPF states:

^[1] House of Lords Written Answers, 25th October 2011 (HL12501)

“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.”

Whilst the draft NPPF does not explicitly state that the latest household population projections should be used, the fact that it does state that any assessment of the scale and mix of housing required should meet household and population projections and be based on up-to-date and relevant evidence indicates the latest figures would provide a more robust assessment than those figures published four years earlier. We therefore contend that the Council are using out of date household projection data which does not accurately reflect the current situation within the District. As a result they should use the figure of 520 dwellings per annum as contained in the 2011 SHMA as the basis for determining the amount of housing that is needed.

Clearly, if the SHMA figure of 520 dwellings per annum is used this would result in an increased total requirement of 8,320 dwellings of which 6,500 dwellings would need to be allocated. This would represent an increase of 343 dwellings to be accommodated in the DSVs. The table below shows the revised housing figure for the District based on the 2011 SHMA annual using figure of 520 dwellings.

(Rounded Figures)	%	Minimum Requirement 16 years total 2011 – 2027	dpa	Existing PPs 31.03.11	New Allocations needed (dw)	% of new allocations
Selby	51	4,240	265	1,150	3,090	47
Sherburn	11	915	54	70	845	13
Tadcaster	7	582	36	140	442	7
Designated Service Villages	29	2,413	150	290	2,123	33
Secondary Villages	2	170	10	170	-	-
Total		8,320	520	1,820	6,500	100

Table 1 – Revised Table for Policy CP2 to reflect the more up-to-date annual dwelling requirement of 520 per annum

The proposed increase in annual dwelling provision would mean that each of the settlements including the DSVs, would have to accommodate more dwellings, although the relative proportions that each would have to provide would remain the same. In relation to the DSVs that are identified certain villages such as Brayton, which are located in close proximity to Selby and already have a good range of infrastructure, are considered more sustainable. Accordingly we feel that there would be merit in the Council identifying a further tier of settlement in the settlement hierarchy that included the more sustainable DSVs such as Brayton, a point that the Inspector intimated at the Examination. These villages are considered suitable to not only accommodate the current level of housing proposed in the Submission Version Core Strategy but the additional housing that would need to be identified as a result of using the 2008 household projections data. The more sustainable DSVs would therefore accommodate relatively more housing than the other DSVs in the

District, which we believe is entirely appropriate due to their sustainability, level of existing service provision and proximity to Selby.

In summary, we believe that the proposed change to increase the annual housing requirement from 440 to 450 dwellings per annum would result in the Core Strategy being 'unsound' as the figure is not based on the most up to date evidence that is currently. Accordingly to make the Plan sound, we would recommend that the Council use the annual housing requirement of 520 dwellings as calculated using the 2008 household projections and set out in the latest SHMA. We note that by increasing the total number of dwellings that would need to be allocated, a new tier should be created in the settlement hierarchy, which identifies the most sustainable DSVs (including Brayton) as being most suitable to accommodate the increased allocations for the DSVs. In doing so, the additional housing to be accommodated in the DSVs can be directed to the most sustainable locations, rather than distributing it across the district in less sustainable settlements with fewer services and less infrastructure.

Phasing

Revised Policy CP2 introduces a phasing policy which seeks to limit new housing growth to 400 dwellings per annum in the first five years, 460 dwellings per annum in the second five year period and 500 dwellings per annum in the final third five year period of the plan. We wish object to the phasing proposed within revised Policy CP2 as notwithstanding what the overall housing requirement is, phasing we believe could potentially result in there being a shortfall in meeting ever increasing housing needs in the short term.

We note that the Council dismissed the option of including a phasing policy within the Site Allocations DPD Preferred Options, which was published for consultation on September 22 September 2011. They accepted "that phasing will be achieved through the market adjusting itself – delivering more in the boom periods and less in the slack periods". We support this position and question why such a policy has now been introduced at this stage of the Core Strategy.

Notwithstanding the above, we feel that the arbitrary setting of a limit of 400 dwellings per annum in the first years of the plan is contrary to the Government's 'Planning for Growth' agenda. The Ministerial Statement published on 23rd March 2011 stated that:

"The Chancellor of the Exchequer has today issued a call to action on growth, publishing an ambitious set of proposals to help rebuild Britain's economy. The planning system has a key role to play in this, by ensuring that the sustainable developed needed to support economic growth is able to proceed as easily as possible."

It goes on to state:

"Local planning authorities should therefore press ahead without delay in preparing up-to-date development plans, and should use that opportunity to be proactive in driving and supporting the growth that this country needs. They should make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth, taking full account of relevant economic signals such as land prices."

Delivery of new housing has a key role to play in achieving growth and helping with the economic recovery. We therefore do not understand why the Council are seeking to limit the development of new housing within the first five year period of the plan, when there is a strong case to say that there is a greater need to build more houses now than later in the Plan period.

Similarly emerging guidance in the draft NPPF at paragraph 24 states that Local Plans should:

“- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework.”

Proposing a phasing policy that seeks to restrict new residential development in the early stages of the plan does not indicate a very positive approach to the planning of the District, and thus we feel is contradictory to the guidance in the emerging NPPF. As such, we would suggest that the Plan as currently drafted is unsound as it is not consistent with national policy. To make the Plan sound we would ask that all references to the phasing of residential development be deleted.

In summary, we object to the inclusion of a phasing policy within Policy CP2, as we believe there is no reason to artificially restrict the delivery of new housing in the first five year period of the Plan. This is particularly pertinent in light of the Government's 'Planning for Growth' agenda and emerging guidance in the draft NPPF, both of which emphasise the need to plan positively in order to kick start economic development and bring about the economic recovery. Delivery of new housing can be controlled through adequate monitoring and maintaining an up-to-date assessment of housing supply within the District. Similarly, the annual housing requirements are no longer maximum figures and such if there is an over provision, the trajectory can be amended going forward, through the monitoring process. As such, we do not feel that there is a need for any form of phasing to be included within the Core Strategy and that delivery of housing should be left to the market. Consequently we recommend that all references to phasing are deleted.

We trust that you will take our comments fully into consideration but if you do have any questions or would like to discuss any of the issues in further detail, please do not hesitate to contact me.

Yours sincerely,

on behalf of
DAN HATCHER
Associate

Enc.

cc Joanna Loxton – Church Commissioners