Gladman Developments Ltd

Representations on

PLAN Selby: Draft Studies and Evidence Base

GLADMAN

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1. Introduction

1.1   Gladman specialises in the promotion of strategic land for residential development with associated community infrastructure. These comments provide Gladman's response to the draft Studies and Evidence Base relating to PLAN Selby and follow our previous comments in response to the Council's initial consultation on the Plan in November 2014.

2. Draft Strategic Housing Market Assessment

Q1a The housing market areas in and around Selby

2.1   Selby District has very strong relations with York in particular and Leeds to a lesser extent as recognised in para 2.70 of the draft SHMA. Whilst the difficulty in assessing need in areas with overlapping housing market areas is noted, the strength of the relationships with York and Leeds do suggest the requirement to consider housing need across a wider area than Selby alone which has a very low level of self-containment. It is relevant that York City Council faces a number of significant constraints in meeting its housing requirements and there may therefore be a requirement for Selby to accommodate some of this unmet need.

Q1b   Trend based demographic projections

2.2   Gladman agrees that the utilisation of 2012 based SNPP and the 2012 based SNHP is an appropriate starting point for the consideration of the objectively assessed housing need for Selby. These projections should be amended, where necessary, to reflect any suppression in household formation rates, particularly in the 25-44 year old age groups that may have underpinned in the 2012 projections.

Q1c   Economic led projections

2.3   The SHMA presents the results of an economic scenario in which the demographic starting point is adjusted to ensure that sufficient housing is provided to support jobs growth in Selby over the plan period. The jobs growth assumptions are based on forecasts taken from the Yorkshire and Humber Regional Econometric Model produced by Experian, suggesting an annual average growth for Selby of 0.7%. This is well below the average annual growth rate achieved in Selby in the past.

2.4   Gladman considers that there are strong grounds for an alternative economic scenario which uses assumptions about future economic growth which are closer related to past trends. Figure 1 below shows the annual growth rate of 0.7% per annum in the context of historic average annual growth rates achieved in Selby over the past twenty years (1993 to 2013) using Oxford Economics data. It shows that the only period over which the average annual growth rate has fallen below 0.7% is

over the past 5 years (2008 to 2013) which was largely due to a fall in employment in 2009 as a result of the economic downturn. Since then Selby has undergone a strong recovery underlining the resilience of the local economy.

Figure 1 Comparing the SHMA Jobs Growth Rate with Past Trends

Source: Oxford Economics Historic Data

2.5   The SHMA also notes that the growth rate of 0.7% is the same growth rate as for Yorkshire and Humber as a whole. This is not consistent with past trends which show the economy of Selby has consistently grown at a much stronger rate than the regional average since 2000 (see Figure 2 below).

Figure 2 Employment Change Index 2000 -2013 (2000 = 100)
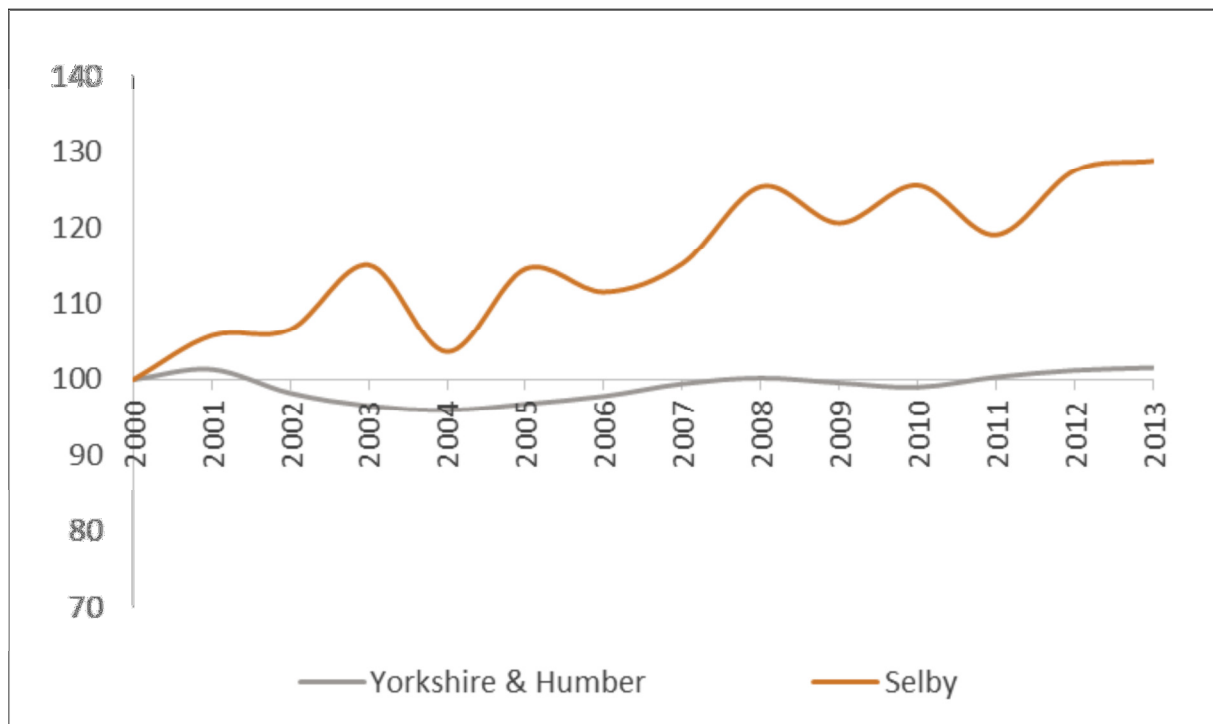
Source: Oxford Economics

2.6   The following are considered to be key strengths of the Selby economy which leave it well placed to achieve much higher levels of growth than the regional average in the future:

- Selby's economy is far less exposed to public sector spending cuts with just 20% of employment in the public sector compared to 29% in Yorkshire and Humber as a whole;
- Selby has a highly skilled population with 26% of residents holding a degree level qualification or above compared to 23% in Yorkshire and Humber. Areas with higher skilled populations tend to see greater levels of investment from knowledge based industries which are seen as the key drivers of future economic growth;
- Selby has a higher business start-up rate than the regional average. Over the period 2011 – 2013 there were around 6.2 businesses created in Selby for every 1,000 working age residents, compared to 5.7 across Yorkshire and Humberside as a whole.

2.7   The SHMA makes a number of assumptions about changes in the employment rate of males and females over time, based on the Experian Regional Economic Model. The largest percentage changes assumed are for both males and females between the ages of 25 and 49 and for females between the ages of 25 and 49.

2.8   Gladman agrees that it is necessary to make an adjustment to current economic activity rates for older age groups. This is to take account of changes to the state pension age and the tendency for people to stay in work longer. However, Gladman question the robustness of a number of other assumptions:

- The SHMA assumes that the employment rate of 16 to 24 year olds is unchanged over the plan period and stays at the level it was at the time of the 2011 Census. In practice the employment rate is likely to fall due to changes in the compulsory education age which means that from 2015 onwards young people will need to stay in school or other form of education/training until they are 18.
- The increases in employment rates for females between the ages of 25 and 49 suggest a significant closing of the gap between males and females with the difference narrowing to less than 2 percentage points by 2037 (from 9 percentage points in 2011). This is considered to be unlikely given that females in this age group are more likely to have children and therefore take a short or long term break from the labour market. A report by ONS on women in the labour market shows that the employment rate of females with children is lower than males or other females without children in both age groups (see figure 3). The gap is even wider for single mothers and low income families due to the costs of childcare. A significant gap would therefore be expected to persist unless there was clear evidence that the costs of childcare would fall or that there would be a rebalancing in the roles of mothers and fathers in responsibility for childcare in which case a fall in the economic activity rates of a males would be expected.

2.9 It is also the case that Selby already has a very high female employment rate and it is questionable how much further it could rise. The employment rate of 35 – 49 year olds is already in the 97th percentile of districts in the country and is 8 percentage points above the national average. The assumed increase to 91.7% has not so far been achieved by any other district in England.

Figure 3 Employment Rates of Women aged 25 to 49 in the United Kingdom

	Males			Females		
	2014	2037	% Point Increase	2014	2037	% Point Increase
Aged 16 to 24	63.8%	63.8%	0.0	63.1%	63.1%	0.0
Aged 25 to 34	90.0%	90.2%	0.2	82.9%	88.5%	5.6
Aged 35 to 49	92.7%	93.7%	1.0	86.4%	91.7%	5.3
Aged 50 to 64	77.0%	81.4%	4.4	65.8%	75.0%	9.2
Aged 65 and over	16.3%	17.2%	0.9	9.2%	10.9%	1.7

Source: Labour Force Study

Q1d Affordable Housing Need

2.10 Gladman agrees with the need for affordable housing identified in the SHMA. The SHMA does, however, appear to suggest that an element of affordable housing is provided by the private rented sector. The definition of affordable housing as set out in NPPF does not include the private rented sector and this has been confirmed in many recent appeal decisions and Local Plan examinations. No reliance should

therefore be placed upon the contribution that the Private Rented Sector could make to the provision of affordable housing.

Q1e   Market Signals

2.11   Gladman agrees with the conclusion in the SHMA that there are grounds for further adjustment to the demographic starting point. However the adjustment applied result in a modest increase and is based only on adjusting the household formation rates of 25 to 34 year olds which in total results in an uplift of 33 dwellings per annum (or 8.6% based on the 2014-2027 period or 9.6% based on the 2014-2037 period

2.12   This uplift is considered to be insufficient for the following reasons:
- The adjustment applied to household formation rates of 25 to 34 year olds is because there was a significant fall in household formation amongst that age group between 2001 and 2011 so they return it to the level it was in 2001. That logic should be applied to other groups where there were similar, if less extensive, reductions in household formation rates – for example amongst the 35-44 year old cohort;
- The SHMA identifies a net need for 172 affordable dwellings per annum, which is made up of a combination of existing households already in need, existing households falling into need and newly forming households in need, This figure is largely the same as the earlier 2009 SHMA. Whilst the objectively assessed need is adjusted for the effects of double counting and the role of the private rented sector, the facts are that there is a sustained affordable need in Selby.

2.13   Given the market signals and affordable housing need in Selby, an adjustment in excess of 8.6% is warranted. Gladman's initial view is that an adjustment of between 10% and 15% would be appropriate.

Q1f   The need for different types and sizes of homes

2.14   Gladman agrees with the content of Paragraph 7.88 of the SHMA which states that the market is the best judge of what is the most appropriate type and size of house to deliver at any point in time.

Q1g   Housing needs for specific groups of the population

2.15   Gladman has no comments that it wishes to make at this time regarding housing needs for specific groups of the population.

Q1h   Draft conclusions

2.16   The key finding of the draft SHMA is that Selby district's objectively assessed need for housing is circa 430 dwellings per annum for the period 2014-2027.

2.17   Gladman considers that this figure does not represent the FOAN for Selby for the following reasons:

- The economic scenario uses job growth assumptions (+0.7% per annum) that are much lower than past trends (+1.2% to +1.3% per annum). There

are strong grounds for utilising a growth rate more consistent with past trends (of circa 1.0% to 1.3% per annum jobs growth) and above the assumed growth rate for Yorkshire and Humberside. This would have the effect of increasing the number of dwellings required to support economic growth;

- Significant and excessive increases in the employment rates of women aged 25 to 49 are used and, unlike most OANs, there is no reduction in the employment rates of 16 to 24 year olds. A more realistic perspective should be adopted; and
- The adjustment made for market signals is too modest and should be increased when considered alongside the evidence of the need for affordable housing.

2.18   In the light of the above, it is considered that the full objectively assessed need for Selby is unlikely to be less than 550 dwellings per annum. This figure excludes any unmet need from York which, as indicated above, should be considered as being in the same housing market area as Selby based on the available evidence.

3.   Draft Stage 1: Green Belt Study

Q3   (GB) Using the information within Table 8 of this study, do you have any comments on the approach by which General Areas could be defined as 'weakly' or 'more strongly' fulfilling the five national purposes of the Green Belt (as defined within NPPF Paragraph 80)?

3.1   Firstly Gladman has concerns regarding the approach to defining General Areas. The approach has resulted in inconsistency in that there are some very large areas (e.g. Central 1) and some very small areas (e.g. West 4). Where very large areas are defined, the extent to which the 5 Green Belt Purposes are met may vary considerably within those areas, particularly in respect of areas on the edge of settlements and more remote areas. As noted in the Study this was a concern raised by the Inspector appointed to conduct the Cheshire East Local Plan examination. The Inspector commented that such an approach "may not have been as fine grained as it could have been, omitting some smaller parcels of land on the fringes of settlements which might have had less impact on Green Belt purposes".[1]

3.2   Secondly, Gladman considers that the use of landscape quality in assessing the general areas against Green Belt purposes 2 and 3 is inappropriate. It is clear that Green Belt is not designated having regard to landscape quality; that is the purpose of National Park and Areas of Outstanding Natural Beauty designations. Whilst landscape quality is clearly an important part of the site selection process, it should be carried out as a discrete exercise, completely separate from the Green Belt Study.

Q4   (GB) Do you have any comments on the approach to defining purpose 5 of the Green Belt Review?

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[1] Para 85 Cheshire East Local Plan Inspectors' Interim Views Letter 6th November 2014

3.3 One of the inherent consequences of Green Belt designation is to encourage the reuse of derelict and underused land in urban areas and therefore it could be argued that all Green Belt parcels will contribute towards that objective.

3.4 Gladman considers that the presence or otherwise of Regeneration Priority Areas is not an appropriate factor to take into account in the scoring process as the designation of such areas is not based on objective evidence. A more appropriate and objective consideration would be the amount of developable and available derelict or underused urban land in the locality of the particular parcel of green belt land to be assessed.

4. Site Allocations: A Framework for Site Selection

Q9a (SS): The overall approach to the site selection process set out in section 6.3 of the study?

Stage 1: Initial Sift

4.1 Gladman agrees that allocations should generally be in conformity with the settlement hierarchy set out in the Core Strategy. However, the automatic exclusion of any site in a secondary village would be inappropriate and contrary to paragraphs 54 and 55 of NPPF which seek to promote sustainable development in rural areas particularly where it will enhance or maintain the vitality of rural communities and provide affordable housing to meet local needs.

4.2 With regard to Flood Risk, the automatic removal of all sites falling within Flood Risk Zone 3b would be inappropriate. In circumstances where a site includes a proportion of Flood Risk Zone 3b land, the site selection process should recognise that the NPPF Technical Guidance for Flood Risk allows such areas to be used for water compatible uses and specific essential infrastructure, subject to passing the Exception Test.

Q9b: The details of the site assessment work proposed in Appendix A of the study?

4.3 With regard to the criteria relating to the proximity of primary schools, GP surgeries and convenience stores, the site selection framework should take into account that for larger developments the on-site provision of such facilities within the development may be possible. The development may also be of sufficient scale to fund improvements to public transport.