

67

ryan king

From: Beverley Smith
Sent: 10 February 2012 15:53
To: ldf
Cc: Nita and Tim Shah-Evans and Evans
Subject: Representations to Core Strategy CD2d Fifth Sets Of Proposed Changed
Attachments: Green Belt reps to CS 2 jan 2012.pdf; Green Belt reps to CS jan 2012.pdf; Housing Allocations CP3.pdf; Housing Number Reps 1 Feb 2012.pdf

Dear LDF Team,

Please find four sets of representations to the Core Strategy January 2012.

Please could you confirm receipt. (i have not been able to add a formal signature, if this is a problem, I will print and send instead - please advise)

Many thanks

--

Beverley Smith

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

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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:

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If you have entered No to 1.2, please continue to Q2. In all other circumstances, please go to Q3.

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2.1 Justified (Please identify just one test for this representation)

2.2 Effective

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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:

Policy CPXX Green Belt

The proposed policy does not accurately reflect the detail of the supporting text 4.29g - 4.29o particularly where it is considering the matter of Green Belt Review and also the potential for introducing Safeguarded Land.

The policy needs to be effective, namely deliverable. Therefore there needs to be greater guidance and precision concerning the criteria for review. The review process needs to be consistent with appropriate national policy and additional criteria should not be added, as at 4.29n, especially as this repeats 4.29l.

Given the importance of ensuring that there is adequate land to meet the economic development and housing needs of the District it may be appropriate to provide a policy relating solely to Safeguarded Land, the process for identifying it and the process for its future development. The accompanying text and sentence at Criterion D 4 "... and the need for growth beyond the plan period by identifying Safeguarded Land..." is not precise and introduces further uncertainty about the future of the Green Belt Review and potential future allocations for development.

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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.

Suggested wording:

New Safeguarded Land policy required.

Amendments to the supporting text to remove repetition and unnecessary text - 4.29n

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5.2 Attend Examination

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(Your request will be considered by the Inspector, however, attendance at the Examination in Public is by invitation only).

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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 Beverley Smith

Dated 10 February 2012

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Policy CPXX Green Belt C. Major Developed Sites.

The commentary at 4.29c - 4.29f does not accurately reflect Annex C of PPG2. Consequently, this is not followed through into the policy. PPG2 refers to MDSs that may be in continuing use or redundant. Redundant sites within the Green Belt may also be appropriate for redevelopment subject to C4 Annex C.

It is not certain how/when alternative sites may be considered for MDS status given that the SADPD has already been released. Policy CPXX should state that along with a Green Belt boundary review there will also be a review of MDS. The SADPD should be amended and re-issued.

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Suggested wording:

CPXX C "..... A review of Major Developed Sites that are in continuing use or are redundant will be undertaken through a lower order DPD."

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The delivery of housing needs to be proactively maintained and remedial action taken quickly and effectively to stimulate the housing market.

Consequently the SADPD needs to be regularly updated and if there is not a deliverable supply then a more radical approach to identifying allocations needs to be sought. This may require identifying land within the Green Belt.

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Policy CP3 should be amended to set out how alternative sources of deliverable housing sites might be identified should there be a shortfall in housing provision.

Remedial action needs to be more proactive in order to stimulate supply and delivery and options for managing the supply more effectively may be the following:

- Green Belt Review
- Identifying Safeguarded Land for future housing development
- Allocation Major Developed Sites (including redundant sites in the Green Belt) for residential development.

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The proposed amended Policy CP2 does not address the concerns raised by the Inspector at the Examination. He considered that there was a strong body of evidence that pointed to a current level SIGNIFICANTLY above the RSS figure of 440 dpa. The new figure derived following research by Arup concludes that 450 dpa would be adequate. However, their work concludes at 5.6 paragraph 7 (CD56) that the average annual longterm trend is 465 units (based on evidence collated from the period 2000 to 2010). The SHMA identifies the Market Areas at para 3.5 and notes that the district is not self contained with strong migration to Leeds and York for employment purposes. It would appear appropriate therefore that consideration is given to the provision of further housing allocations to the north of the district in places where people want to live. This will

SEE ATTACHED FOR FULL TEXT

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Amend Policy CP2 to reflect a higher annual housing figure of 465 units.
Amend Policy CP2 to remove phasing and allow a more even distribution of housing numbers throughout the plan period.
Amend Policy CP2 to provide an improved distribution of housing better reflecting the market demand and the need for new housing to the north of the district, addressing employment patterns.

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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).

(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

Beverley Smith

Dated

10 February 2012

Question 3

The proposed amended Policy CP2 does not address the concerns raised by the Inspector at the Examination. He considered that there was a strong body of evidence that pointed to a current level SIGNIFICANTLY above the RSS figure of 440 dpa. The new figure derived following research by Arup concludes that 450 dpa would be adequate. However, their work concludes at 5.6 paragraph 7 (CD56) that the average annual longterm trend is 465 units (based on evidence collated from 2003/4 - 2010). There seems no justifiable reason to adopt the 2004 Projections instead. Actual longterm trends over a period of economic growth and decline would be more relevant rather than forecasts taken in a period of economic growth. In addition, the work undertaken for the SHMA indicates a need for over 700 units per annum. It would therefore seem reasonable to address the Inspector's concerns about a potential undersupply of housing in the District and provide a minimum annual figure of 465dpa.

Policy CP2 also includes a phasing strategy with lower figures of housing delivery in the early years increasing to 500dpa in the later years of the Plan. There is no justification for this approach and a more even rate of supply should be provided. This will negate the need to predict economic cycles (which is notoriously difficult) and provide a more even approach to delivery, which would benefit the house building industry.

Policy CP2 then sets out the distribution of the proposed housing. There appears to be an over emphasis on provision in Selby. The SHMA identifies the Market Areas at para 3.5 and notes that the district is not self contained with strong migration to Leeds and York for employment purposes. It would appear appropriate therefore that consideration is given to the provision of further housing allocations to the north of the district in places where people want to live. This will enable easier access to jobs and services.

The SADPD needs to be updated to reflect the requirement for additional land for housing and should consider a distribution more aligned to the SHMA.