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ryan king

From: Julie White [Julie.White@dpp-ltd.com]
Sent: 14 February 2012 18:48
To: ldf
Subject: Comments on Core Strategy Changes
Attachments: DPP Comments on 5th set of changes to Submission Core Strategy.pdf

Please find attached our comments on the 5th set of changes to the Submission Draft Core Strategy.

Kind regards
 Julie White (julie.white@dpp-ltd.com)
Principal Planner
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www.dpp-ltd.com
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If you are experiencing any problems contacting DPP, please call our IT team on 01234 321 123

Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

	Personal Details	Agents Details (if applicable)
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First Name	Mark	
Last Name	Lane	
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Telephone No.	0113 243 8399	
Email address	mark.lane@dpp-ltd.com	

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

5.10

(which can be found on the Published Schedule, CD2e)

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1.2 Sound Yes No

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2.1 Justified

(Please identify just one test for this representation)

2.2 Effective

2.3 Consistent with national policy

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We welcome amendments to the annual average housing requirement to reflect the most up to date evidence base. The housing requirement is therefore more soundly based and better reflects advice contained in PPS3 which advocates utilising up to date data sources. However we object to the Core Strategy providing for lower targets in the early years of the plan period.

Furthermore whilst we welcome the increase in the average new dwellings to be provided each year, the revision still falls short of the actual need which is in excess of 500 units per annum. The average figure should be 500 units per year. We therefore object to this amendment.

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The reference to the lower housing targets in the early years should be deleted for reasons we'll come onto in other representations and the annual average target should be increased to 500 dpa.

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I agree with this statement and wish to submit the above representation for consideration.

Signed

Mark Lane

Dated

14/01/2012

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

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We support the revisions to the paragraph 5.17 in reference to Sherburn-in-Elmet as it places the allocations on a more sound footing by linking it to the evidence base.

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We support the amended paragraph 5.18 which identifies designated service villages as suitable to meet the identified need for affordable properties, and doesn't solely place this burden on Sherburn-in-Elmet.

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We agree that the housing delivery figure should be specified as being just a target and not a precise number.

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We support the revised Policy CP2 which reflects more recent housing requirements than the original figure taken from the RSS. In particular we also support the additional housing allocations required in Sherburn-in-Elmet.

However we object to the reduction in the target for the earlier part of the plan period. It is apparent that the lower target is based on the Local Planning Authority's assumptions as to the level of dwellings that can be built and is not related to actual housing need. The ONS household projections suggest for Selby district, that the housing need is greater during the early years than at the end of the plan period and beyond.

It is therefore counter intuitive to provide fewer houses at the time of greatest need and more houses at a time of lower need. The result of this course of action will be to artificially raise house prices and exacerbate the affordability gap.

In summary whilst the housing market at the moment in time might be challenging, it is not a reason to provide fewer dwellings than that for which there is an identified need.

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Remove the ascending target and replace it with a target which better reflects the ONS household projections.

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Dated

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5.30, 5.33 & 5.34

(which can be found on the Published Schedule, CD2e)

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While we understand the reasoning for the revisions to paragraphs 5.40, 5.43 and Policy CP2; to reduce the annual housing delivery from 440 to 400 in the early part of the plan period, we are concerned that this may stifle delivery should delivery rates increase.

PPS3 and recent Government announcements seek to encourage housing developments and where there are delivery problems it is for the Local Housing Authority to unlock those. One of the methods suggested is to release land for development that is deliverable. It is therefore not acceptable that the local authority should seek to limit the level of housing provision to what it believes can be built. The fact of the matter is that in the future more land needs to be released for development at the earliest opportunity in order to seek to ensure that the housing need is met.

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We partially support the revisions to Paragraph 5.44 as set out in Appendix 4 and in particular paragraph 5.44h which keeps the delivery of housing under review on an annual and spatial basis and suggests interventions will be taken where necessary. However we would suggest that the period for review should be two years and not three, given that it can take two years or more to gain planning permission and to start development a period of three years before action is initiated is simply too long. A period of two years under performance is ample.

We also support paragraph 5.44i which does not require site phasing unless it's due to technical constraints. However for clarity we suggest 'technical constraints' are defined within the text in order to avoid ambiguity over its interpretation at a later stage.

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Amend the period of review from three to two years.

Define 'technical constraints' within the text in order to make it more effective.

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