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**Selby District Submission Draft Core Strategy
Consultation on Further Proposed Changes (6th Set)
June 2012
Representation Form**

An Examination in Public (EIP) into the soundness of the Submission Draft Core Strategy (SDCS) was held between 20 and 30 September 2011 and between 18 and 19 April 2012 in front of an independent inspector.

The Independent Inspector has adjourned the EIP until 5 September 2012 in order to consider the implications of the National Planning Policy Framework (NPPF) on the Submission Draft Core Strategy and for the Council to consult on any further Proposed Changes to the Submission Draft Core Strategy.

Selby District Council is now publishing and inviting comments on a 6th Set of Proposed Changes to the Submission Draft Core Strategy (and associated documents) in order that all parties can make their views known.

The September and April EIP's have already heard the duly made representations on the Submission Draft Core Strategy which were submitted during the formal Publication stage and subsequent consultation on the first 5 Sets of Proposed Changes. The adjournment should not be used as an opportunity to revisit matters which have been fully considered during the September 2011 and April 2012 hearing sessions.

Representations are therefore invited as part of this consultation on the 6th Set of Proposed Changes to the Submission Draft Core Strategy and associated documents.

Please complete separate copies of Part B of this form for each of your separate representations. 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 Thursday 19 July 2012

Email to: ldf@selby.gov.uk

Fax to: 01757 292229

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

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Part A**The Tests of Soundness**

The Independent Inspector's role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. The tests to consider whether the plan is 'sound' are explained under paragraph 182 of the National Planning Policy Framework (NPPF) (March 2012) and states a sound Core Strategy should be:

Positively prepared

- the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified

- the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective

- the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy

- the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

	Personal Details	Agents Details (if applicable)
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It will be helpful if you can provide an email address so we can contact you electronically.

You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B (pages 3-4) to this part of the representation form.

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Part B (please use a separate sheet (pages 3-4) for each representation)

Please identify the Proposed Change (which can be found on the Published Schedule, CD2f) to which this representation refers or paragraph number of the NPPF Compliance Statement:

PC6.30, PC6.46 AND PC6.80

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:

- 2.1 Positively Prepared (Please identify just one test for this representation)
- 2.2 Justified
- 2.3 Effective
- 2.4 Consistent with national policy

Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound and provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound.

POLICY CP1B (PC6.30) Talks about the allocation of land for development within both the main settlements and designated service villages. The new text inserted in response to the NPPF says that the Council will have a preference for "land of least environmental or amenity value"

We would endorse this approach and further point out that it links into our earlier submission (5th set of changes, our given reference 76) wherein we argue that the JSR site on Field Lane, Thorpe Willoughby is indeed of limited environmental quality but has the advantage of being a brownfield opportunity within a sustainable location.

Our problem however is that the overall thrust of the Core Strategy does not prioritise brownfield sites in settlements such as Thorpe Willoughby rather places its reliance on large strategic sites such as Olympia Mill on the edge of Selby town. The inserted text therefore does not ring true when compared to the spatial strategy of the CS - how will this echo the NPPF's reference to "a wide choice of high quality homes" that are deliverable? (paragraph 50).

Policy CP3 (PC6.46)

The new text talks about the supply of "specific deliverable sites" across the 5 year period. We again have reservations about this because of excessive reliance on large sites close to two of the district's main towns. We do not believe the large sites will deliver houses in sufficient numbers; the Council should have identified a more dispersed spatial strategy reflective of the patterns of settlement in the district.

Policy CP12 (PC6.80)

This is concerned with the promotion of sustainable development across the district. The new text talks about a preference for "land of lesser value". Returning to our comments about PC6.30 we believe that the JSR site again passes this particular test. In our view the Core Strategy needs to better reflect the distribution of land such as this across the district as a whole. The spatial distribution of the population reflects, in some measure, the aspirations of its residents. This in turn needs to be better reflected in the Core Strategy.

Continue overleaf

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Question 3 continued

(Continue on a separate sheet if submitting a hard copy)

Question 4: 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?

4.1 Written Representations **4.2 Attend Examination**

4.3 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).


(Continue on a separate sheet if submitting a hard copy)

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 (including on the Council's website) 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

 pp. R. Borrows.

Dated

18/07/2012