



Hambleton Parish Council

Parish Clerk:
Mrs S D Adamson

84

16th January 2015

Dear Sirs,

Re: Comments on PLAN Selby submitted as part of the Initial Consultation process

Please find below comments on PLAN Selby with which have been to the relevant questions.

Question 4 – Please let us have your comments on the planned approach ensuring PLAN Selby is positively prepared

- The further consultation is shown to be planned for July/August but many of the reports are not expected to be delivered before September 2015 therefore they would not be included in the Further Consultation which would be unacceptable as the public consultation would not include all the evidence collected.
- 6 weeks for the Further Consultation stage response time is too short giving Parish Councils limited time to read the document, discuss, agree and submit comments as many Councils will meet monthly.

Question 5a - Are these the right objectives?

- Objectives, even at a strategic level, should be specific, measurable, achievable and realistic. Those included in PLAN Selby are none of these and their exact meaning is not clear to someone who is new to this type of process, so clarity would be appreciated. Will the objectives in the next version be more specific and measurable? For example:
 - Objective 1 – what does deliver sites mean? How many and for which purpose?
 - Objective 2 – will site selection consider all the objectives included in the sustainability report?
 - Objective 3 – will it be all 'places' such as towns, service delivery villages (SDV) and secondary villages?
 - Objective 7 – shouldn't all policies be criteria based?

Question 5b- Are there any other objectives which should be included?

- How will your stated objectives and PLAN deliver 'a distinctive rural District'?

Question 6c – Which ones are most important and which ones less relevant?

- The list of topics in order of priority in my opinion should be:

- T4 – Infrastructure needs
- T3 – Defining areas for promoting development and protection key assets
- T6 – Protection and enhancing the environment
- T2 – Promoting prosperity
- T1 – Providing homes
- T5 – Climate change and renewable energy
- The change of priority is suggested for the following reasons, although the list is not exhaustive:
 - because the development of homes, particularly in SDVs, without the appropriate infrastructure, for example will result in families with primary school age children having to take them to another village, therefore reducing their involvement in the local community.
 - On the assumption that the PLAN wishes to support the desire for people to be able to work in the locality in which they live the promoting of prosperity, namely jobs, needs to be a high priority. The Council figure indicate that there were 2,300 unemployed in Selby in 2009 so adding people requiring employment will make the situation worse. If the Council wishes to promote prosperity they need to have identified areas suitable for industrial use.
 - If Selby area is to be a distinctive rural district protecting and enhancing the environment is of vital importance.
 - While climate change and renewable energy are important the area is contributing substantially to this outcome with the introduction of bio-mass at Drax. There could also be requirements for example, addition of solar panels to new homes, which could ensure this is meet with limited visual impact on a distinctive rural district.

Question 7a – Do you agree with the proposed approach to the base date?

- Taking the base date of March 2015 means that the numbers built and permissions given between 2011 and 2015 will be deducted from the 7,200. However those already built or given permission will not be taken into consideration when making an allocation to, for example, DSVs. This could have a major impact on infrastructure, facilities and character of DSVs.
- Para 3.15 - The definition of 'windfalls' indicate that these are expected to be small developments with one or two houses. But the statement in this paragraph says any planning permission after this date does not mean the same thing?

Question 8a – Should PLAN Selby over-allocate to allow for any non-delivery on the allocations? By what method and by how much?

- Is this necessary if the Council have to develop 5 year plans for land banks? Surely action could be taken at these 5 yearly intervals if it is apparent that the target is not being met.

Question 8b – How should PLAN Selby seek to allocate sites in such a way as to secure delivery over the whole plan period?

- Knowing the land held by developers in their land banks would be a good start, otherwise will be difficult to secure delivery.
- Identifying all possible brown field sites, including those in DSVs and Secondary villages, which are suitable for development.

- 02
- Much of the potential development land shown in the PLAN, particularly in DSVs, is farm land. It is difficult to see how this could be achieved. We believe farmers need more land to make farming viable rather than less.
 - If both DSVs and Secondary villages were included rather than just DSVs there would be a greater opportunity for small sites to be included, which may well appeal to some smaller developers.

Question 8c – Is there an opportunity to have contingency sites in case others are not delivered elsewhere in the District.

- This should not be necessary however, contingency sites should only be considered if those contained and agreed in the PLAN are not delivering the required numbers. This appears to be an expectation of failure of the PLAN before it is implemented.

Question 9a—Is a simple percentage growth across all DSVs a fair an appropriate starting point for deciding the split between DSVs?

- No - a simple percentage growth across all DSVs is too simplistic and does not take account of local infrastructure, facilities or the developments which have been planned or built between 2011 and 2015. It is an accepted fact that as the population grows, more housing of a variety of sizes will be required, but to propose to build large developments over short periods of time can and will overwhelm villages and villagers. Facilities and infrastructure rarely keeps pace with such levels of construction creating problems in the locality. Smaller developments that easily integrate into village communities would help prevent further erosion of the ethos of living in a rural environment and therefore contribute to the vision of 'a distinct rural district'.
- If all villages, DSV and Secondary villages, were included and a figure was calculated using a small percentage of the house already in the settlement would perhaps deliver the same overall requirement with less impact on each. It would also give more people the opportunity to buy property in the Secondary villages.

Question 9b – Bearing in mind issues such as land availability, flood risk and other technical constraints are there particular criteria that should be taken into account in assessing the final minimum target for DSVs?

- Availability
 - The impact of the loss of farming land within village boundary should be considered as developments should enhance rural communities (point 4.27 Revised Core Strategy).
- Criteria
 - The impact of additional traffic on roads leading to a settlement should be considered as part of the accessibility.
 - The provision of health services should be one of the criteria, for example Hambleton does not have a GP surgery at all, whereas villages of similar size do e.g. Hemingbrough.
 - The availability of public transport is an important factor when considering accessibility. It is not possible to get from Selby to Hambleton after 1800 so for many this does not allow them to return home from work on public transport. For anyone working in Leeds if they are unable

to catch the 1805 they have a wait of 1 hour and 15 minutes as the next and last bus leaves at 1920.

- Character of the individual settlements is very important as increasing the housing stock on land currently used for agriculture within the village boundary will certainly result in a change of the character to the village.

Question 10 –The Core Strategy sets the ‘rules’ for choosing sites; but do you have any views on the relative importance or weight to be attached to the criteria for site selection?

- The statement in the Core Strategy that development in Secondary Villages will be restricted. However the limitations to be applied to developments in these areas would seem rather short sighted as this restriction will reduce the possibility of affordable housing being available for people within the village thus reducing potential employees for local businesses.

Question 25 – Are there any infrastructure requirements that have not been identified, including small scale local needs?

- The infrastructure requirements within Hambleton to support current developments are:
 - The water treatment facilities will need to be expanded.
 - The school would need to be enlarged.
 - Provision of some form of healthcare services within the village even if it is only opened for two or three days a week.
 - Improvement in public transport as there are very limited services in the evening no buses on a Sunday.
 - Improved super-fast broadband as currently there is limited availability in the village.
 - Improved traffic management on the A63 which divides the village.

Question 26a–Providing a revised target for the plan period to 2027 for installed renewable energy?

No target should be included - Why would the PLAN include any targets for installed renewable energy when the targets in the RSS were dropped by the Government? Provision of renewable energy within PLAN Selby should ensure that such energy is derived from developments that will provide high levels of sustainable, low carbon emissions and continuity of supply whilst having limited impact on the countryside environment and residents of the District. The AECOM Study referred to is dated and likely to be biased as this company is a member of the Wind Farm Association with no consideration given to renewables such as the biomass unit at Drax Power Station, aerobic digesters in advanced state of construction or future planning application for further digesters. How would the construction of wind farms contribute to the vision of ‘a distinctive rural district’?

Question 26c – Including specific requirements for sustainable building design subject to local viability testing?

- Why require standards which are higher than applied nationally? This would have an impact and may result in reluctance by ‘developers’ to undertake building in the area.

Question 26e – Identifying separation thresholds? What might they be?

- This would need to be detailed and consider various sizes of wind farm, height of turbines etc. Surely any such separation should be influenced by ongoing research and resultant recommendations for the acceptable distance from houses, noise levels, health implications, effect on wildlife which might well change over the life of the PLAN.

Question 50a – How should Hambleton grow and develop?

- 5.73 p113 mentions the Garth Play Area, it is important to note that the age limit for using this area is 12 years.
- 5.73 p113 mentions the large playing field outside the village but the access road to this is not safe for pedestrians and very few young people from the village are allowed to travel from the village to the field without being accompanied by an adult.
- Priority should be given to brown field sites within the village.
- Growth and development should add rather than detract from the rural/farming aspects of the village. Hambleton/001, 002, 003, 004, 005, 006 and 008 are all currently used by local farmers so would have considerable impact on the village. Hambleton/007 is no longer used for agricultural purposes but would generate a second settlement within the Parish of Hambleton but well beyond the village envelope.
- Consideration when allocating development land should be given to the impact on internal village car journeys.

Question 50b – what else is needed in Hambleton that could be allocated a site?

- A GP surgery
- More class rooms as the school will already be under pressure with the housing developments already approved in the village since 2011.

As a general comment it would be useful, if in future documents you refer to others, for example the Core Strategy, if a reference was included.

Yours faithfully,

S D Adamson (Mrs)
Clerk to Hambleton Parish Council