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ryan king

From: Michael Edgar [michael.edgar@dlpconsultants.co.uk]
Sent: 18 July 2012 16:36
To: ldf
Cc: Roland Bolton (forward)
Subject: Selby Core Strategy Proposed 6th Changes Modification Representations
Follow Up Flag: Follow up
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Attachments: YK1879-further_submission_v6.pdf

Dear Sir / Madam,

Please see attached the representations made by DLP Planning Ltd in response to the sixth set of proposed changes on the Core Strategy.

It remains DLP's case that the Core Strategy remains unsound as is not positively prepared, justified by evidence or consistent with the advice in the NPPF particularly in relation to housing requirements and cross-boundary participation.

DLP would also wish to be in presence at the next hearing session into the Core Strategy Examination addressing these matters.

If you require any further information in addition to the attached document please do not hesitate to contact my Director, Roland Bolton, or in his absence me.

Many thanks.

Michael Edgar
Associate Director
DLP Planning Ltd

11 Paradise Square
Sheffield
S1 2DE

t 0114 2289190

f 0114 2721947

email:michael.edgar@dlpconsultants.co.uk

www.dlpconsultants.co.uk

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Registered number: 2604863 Registered office: 4 Abbey Court, Priory Business Park, Bedford MK44 3WH

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23/07/2012

**Examination of Selby Core Strategy
Further submission on Council's Position Statement, 6th Set of Proposed
Changes to the Core Strategy including the Framework and
Statement of Common Ground**

EXAMINATION OF SELBY CORE STRATEGY

Further Submission on 6th Set of Proposed Changes to the Core Strategy including
Council's Position Statement

Prepared by
DLP Planning Ltd

July 2012

1 Introduction

- 1.1 The purpose of this paper is to address the issues raised by the 6th set of Proposed Changes to the Selby Core Strategy and the accompanying Council's Position Statement. DLP do not consider the Plan to be sound on that it is neither the positively prepared, justified by evidence of consistent with national policy. This written response sets out the differences between the Council and DLP on the issues of the overall level of housing requirement and the required approach to be in conformity with the Framework. DLP wish to attend the Examination to give oral evidence and respond to emerging information and how it is being used to inform the Core Strategy.
- 1.2 DLP's case as set out in our original representations remains the same although this paper seeks to update this approach by reference to the 2010 based population projections.
- 1.3 The Council's case as now stated in the Position Statement, Section 3 in particular, is in effect a complete change in their justification for the level of housing proposed in the Core Strategy and so it is necessary to comment on this paper in full.
- 1.4 The production of a Statement of Common Ground was limited by the Council not wishing to agree any facts, included those published by the Government for any other authority area besides Selby. This lies at the heart of the difference in approach. DLP consider that for Selby the influence of the travel to work areas of Leeds and York stretch across the District and that decisions regarding the levels of housing supply must be taken in this context.
- 1.5 This means an understanding of the common evidence base between these three authorities and decisions being made that clearly take into account decisions and policies being followed in other parts of the housing market areas.
- 1.6 DLP are of the view that it was in recognition of these issues that the Framework includes both the policy duty to co-operate between LPA's, and the requirement to seek alternative sites for development when it cannot be accommodated with Local Authority boundaries.

2 The Household Projections

Government Household projections

2.1 A summary of the Government issued household growth projections is set out below.

Table 1 Table 1. Summary of Household Growth Projections

Data source	Forecast average annual household growth	Date range of projections
2004-based CLG Household Projections	450	
2006-based CLG Household Projections	500	2006 to 2026
2008-based CLG Household Projections	550	

Assumptions on Migration and Natural Change in the Sub National Population Projections

2.2 There are differences in migration and natural change assumptions between the various ONS Sub National Population Projections, as set out in the following Table 2.

Table 2 Differences in Natural Increase and Net Inward Migration Assumptions for Sub National Population Projections with Base Years of 2004, 2008 and 2010.

Projections	Average annual natural increase	Average annual net inward migration	Date range of projections
2004-based Sub National Population Projections		660	2004-2026
2008-based Sub National Population Projections	180	730	2008-26
2010-based Sub National Population Projections	230	670	2010-26

Migration

2.3 Table 3 below shows rates of past net internal migration to / from Selby District (this includes domestic and international migration).

Table 3 Table 3: Net Annual Internal Migration To / From Selby District (Source: Home Office Migration Statistics, May 2012 Quarterly Release)

Year	Net annual internal migration to / from Selby District
Mid 2003-2004	300
Mid 2004-2005	500
Mid 2005-2006	700
Mid 2006-2007	1000
Mid 2007-2008	1000
Mid 2008-2009	300
Mid 2009-2010	500

- 2.4 DLP can agree these figures on the understanding that they are from a different source of information to that used by DLP in the next section. DLP have used the data in the CLG live tables "Revised Table 2a Moves within England and Wales Registered during the year ending June 2008". This is a square matrix showing origin and destination Local Authority and provides the level of detail necessary for DLP to undertake the analysis on the impact of future policies on migration flows. The Council have been unable to agree these figures used by DLP. In DLP's opinion the difference is likely to be explained by the fact that above figures are mid-year while the Moves within England" figures are end of year.

3 The Position of the Council

- 3.1 The Council's position is that the objectively assessed housing requirement needs to take into account policy paragraph 3.7 of the Council's Position Statement. There is no such requirement in the Framework. In fact the Framework clearly requires an objective assessment of need followed by a separate and evidenced assessment of the impact of provision (paragraph 14).
- 3.2 Paragraph 152 of the Framework sets out a clear methodology which separates out consideration of impact of meeting the objective assessment of the required housing need (a social element of sustainable development as defined by paragraph 7 of the Framework) from consideration of its likely impact. There are three tests that must be applied before an authority is deemed to not be able to meet its housing requirement. These are:
 - a. Consideration of alternative sites including ones outside of the area.
 - b. Consideration of mitigation
 - c. Consideration of compensation
- 3.3 The Council have clearly not followed this process. The housing requirement has been discounted without the impact of the higher level being appropriately tested as required by the Framework.
- 3.4 The Councils original case as presented in the Arup Report was that the 2004 based household projections represented the most reliable evidence base because the migration levels contained within that projection represented a better long term trend than that included in the 2006 based household projections, the 2008 based household projection and the 2010 based population projections. The Councils consultants still maintain that the 2004 projections are robust and DLP would agree that they were robust at the time of publication, but would argue that they have been superseded by projections which have been improved both in terms of methodology and accuracy.
- 3.5 The Council's position has now completely changed, and it seeks to rely on the 2010 population projections and a level of migration that is below all of the recent population and household forecasts.
- 3.6 The justification of the lower level of migration is "the economy". It is unclear why the economy will have the prolonged impact on migration that the Council is claiming.
- 3.7 Although the Council state that there is disagreement in terms of household size between parties (paragraph 3.6 of the Position Statement) the Council have offered no alternative to the household formation rates in the 2008 projections. The Council have offered no evidence of why an alternative household size should be used or how it should be modelled.
- 3.8 Reviewing the Council's case in terms of its support for the 450 dwellings a year, this appears to be entirely based upon altering the expected level of migration and making no change to household size.
- 3.9 The main element of migration for Selby is domestic movements, not international.

- 3.10 The DLP research included in the original submissions highlighted that the largest movements into and out of Selby are from York, Leeds and East Riding.
- 3.11 In terms of what would prevent the future levels of migration the following are possible causes and DLP's response to them:
- a. The Government population projections for these areas are incorrect. These are nationally produced and are the best available. The projections are subject to consultation and the Council have made no reference to these projections being objected to at the time. At no time have the Council or their consultants suggested that there are fundamental issues with these projections.
 - b. That household formation will slow down as people cannot afford to create new households and so pressure for migration will decrease. The CLG household projections 2008 have already been reduced by 300,000 to take into account the impact of affordability. This is a 6.4% reduction in the projected increase of 4,672,000 households 2006 to 2026 (Town & Country Planning Tomorrow Series Paper 11 "New and novel household projections for England with a 2008 base – summary and review). DLP do not consider it appropriate to apply a further reduction in household formation on top of that already applied without demonstrating a significant evidential basis to support such an approach.
 - c. Selby's economy will perform comparatively poorly so fewer migrants will be attracted to the district than say to Leeds and York. In this case the Council are not arguing against the population projections or the household projections but simply that those people and households forecast to live in Selby will choose to live somewhere else. DLP evidence is that "somewhere else" is most likely to be York, Leeds and East Riding. The implication that the in migration figure for Selby is too high means that the out migration figure for Leeds and York is also too high as Selby is suggesting that these Cities will retain more of their population. DLP would suggest it was precisely in order to address these cross boundary issues at any stage of the plan process that the Government included paragraphs 178 to 181 of the Framework.
- 3.12 DLP's conclusion on the Council's position is actually simple:
- a. The Council cannot demonstrate objectivity in determining the housing requirement – their position now is simply one that adjusts the net migration assumption in order to result in a requirement of 450 dwellings.
 - b. The choice of a net migration figure is not supported by paragraph 159 of the Framework which requires LPA's to "take account of migration" unless the circumstances in paragraph 152 and 178 to 181 apply.
 - c. The neither the higher SHMA requirement of 596 or the 2010 Sub National Population based requirement of approximately 550 dwellings a year have been tested as required by paragraph 152 of the Framework to demonstrate that an alternative strategy would not be more appropriate, or that any claimed adverse impact could not be mitigated or compensated.

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- d. The implications of reducing the net migration into Selby have not been identified and agreed with neighbouring authorities as required by paragraph 179 of the Framework.
- e. The suggestion that under provision of housing in Selby will decrease either the number commuters or the commuting distances is not supported by any evidence. Such an outcome is only possible if the Council can demonstrate that additional homes will be made available in York and Leeds to accommodate the required levels of workers to meet their future employment needs. The Council have failed to produce evidence that these cities will be providing dwellings in addition to the latest household projections. Comparing the published planned levels of housing provision against the Government projections suggest that this is not the case.
- f. The Council have produced no evidence on the future jobs/employment balance in Leeds and York to support the contention that the levels of housing being promoted will have the claimed positive impact on commuting patterns. The failure to establish that the needs of the population will be met closer to these cities is actually more likely to lead to increased rather than decreased travel distances. There has been a long history of constraint of supply both within these locations and the surrounding rural districts – this joint approach of undersupply has increased commuting distances into and beyond Selby.
- g. Lastly the Council argue that the potential reduction in commuting should be given greater weight than meeting the projected requirements of the population.
 - i. Such a balance seems contrary to Core Principle of the Framework set out in paragraph 17 that every effort should be made to objectively identify and then meet housing needs.
 - ii. The Framework does allow this argument to be made but paragraph 14 requires the Council to identify what level of increased commuting would occur, and demonstrate that the impacts of this increased commuting would have a significant effect that would outweigh the benefits of meeting the country's housing needs. It has simply not provided the evidence to support this position. DLP have invited the Council to provide evidence on this matter by encouraging them to look at existing and future levels of jobs and workers in Leeds and York but the Council have refused to consider implications of their policies beyond the district's boundaries.

4 The position of DLP planning

The DLP approach

- 4.1 The position of DLP was derived from what we considered was the proper interpretation of PPS3, the draft NPPF and is now fully compliant with the approach set out in the Framework. This approach may be summarised as follows:
- a. LPA's should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the Framework either as a whole or a particular policy within the Framework (paragraph 14)
 - b. LPA's should boost significantly the supply of housing (paragraph 47)
 - c. Housing demand and need should be objectively assessed and met in full (paragraph 47)
 - d. Assessment of demand and needs should:
 - i. include working with neighbouring authorities where market areas cross boundaries
 - ii. meet household and population projections taking account of migration and demographic change
 - iii. ensure supply necessary to meet demand (paragraph 159)
 - e. If demand is not to be met then the Council need to demonstrate that they have considered:
 - i. alternative locations
 - ii. mitigation
 - iii. compensation (paragraph 152)

Significantly increase the supply of housing.

- 4.2 The supply of housing over the last decade has varied as is illustrated by reference to the SHMA and the CLG Live tables on completions. Both highlight the gradual increase in the level of supply in the period to 2007/08.
- 4.3 The question before the Inspector is whether the proposed level of 450 dwellings for the plan period represents a "significant increase in supply of housing".
- 4.4 It is important for the Inspector to consider exactly what the Government is seeking to achieve by requiring a "significant" increase in supply. The Framework could have simply stated that there was a need to increase supply or substantially boost supply but it does not it requires a significant increase in the supply. The choice of words is important in this context which deals with the statistics of future dwelling provision compared with previous rates of dwelling provision. In this context "significant" does have a particular meaning. A "significant" change in statistical terms means that the difference between the resulting policy and the previously observed value is too large to be attributed to chance.
- 4.5 It is a simple test to establish if the proposed levels of housing represent a "significant" increase in supply. To undertake this analysis one can use the standard deviation as this is a statistic which tells you how tightly all the

various examples are clustered around the mean in a set of data – in this case past completion rates.

- 4.6 One standard deviation above or below the mean accounts for somewhere around 68 percent of the recorded completions. Two standard deviations away from the mean accounts for roughly 95 percent of past and expected future completions. Three standard deviations accounts for about 99 percent of past and expected future completions.
- 4.7 In order for a result to be significant it should normally be at least two standard deviations from the mean.
- 4.8 The table below sets out this calculation. DLP have used both the net completions recorded in the SHLAA but have also undertaken the calculation on for longer period for which the CLG live tables have been used.

Table 4 The calculation of a significant increase in the supply of dwellings

Net Housing Completions	Figure 4. 2: Net Housing Completions, 2003/4 – 2009/10, Selby	Table 253 Housebuilding: permanent dwellings started and completed, by tenure and district, 2009/10
1998/99		220
1999/00		270
2000/01		310
2001/02		200
2002/03		170
2003/04	226	300
2004/05	469	360
2005/06	633	430
2006/07	873	820
2007/08	583	540
2008/09	222	230
2009/10	270	260
mean	468	342.5
Standard Deviation	246	183
Significant at 68% (one standard deviation from mean)	714	525
Significant at 95% (two standard deviation from mean)	960	708

- 4.9 It is clear from the above assessment that the level of housing being proposed by the Council cannot be described in any terms as being a significant increase in the supply of dwellings. To this extent the Core Strategy cannot be considered to be in conformity with the Framework.

An objective assessment of housing demand: The official 2008 based Household Projections

- 4.10 The latest household projections are the 2008 based projections released in 2010.
- 4.11 The results of these projections for this district and the surrounding districts are set out in table 5 below.

- 4.12 The 2008 projections have been amended before release to take into account reduced levels of international in migration and depressed household representative rates. The latter reduces the number of households by 300,000 households nationally for the projection period.
- 4.13 The comparison of these most up to date household projections to the extent RSS are shown in table 6

Table 5 Extract from CLG - Table 406: 2008 based Household projections by district, England, 1991- 2033

Households .000	2001	2006	2008	2013	2018	2023	2028
East Riding of Yorkshire UA	131	141	144	154	165	176	187
York UA	77	81	84	91	97	104	110
North Yorkshire	238	248	252	266	281	297	311
Craven	23	24	24	26	27	29	31
Hambleton	35	36	37	38	40	41	43
Harrogate	63	66	67	71	75	80	84
Richmondshire	18	19	20	21	22	23	24
Ryedale	21	22	23	24	25	26	28
Scarborough	47	48	49	51	53	55	58
Selby	31	32	33	36	39	41	44
West Yorkshire	855	900	918	981	1,049	1,113	1,174
Bradford	181	189	192	205	220	234	248
Calderdale	81	84	86	91	96	102	107
Kirklees	159	164	167	175	185	195	204
Leeds	302	325	334	365	394	421	447
Wakefield	132	138	139	146	154	161	168

Table 6 Extract from CLG Table 406: Household projections by district, England, 1991- 2033 compared to RSS dwelling requirement.

	Total dwelling change 2011 to 2026	annual dwelling change 2011 to 2026	RSS	Difference between CLG and RSS
East Riding of Yorkshire UA	31,312	2,087	1,150	-937
York UA	18,746	1,250	850	-400
North Yorkshire	43,466	2,898	3,170	272
Craven	4,738	316	250	-66
Hambleton	4,326	288	280	-8
Harrogate	12,566	838	390	-448
Richmondshire	2,884	192	200	8
Ryedale	3,296	220	200	-20
Scarborough	6,180	412	560	148
Selby	7,622	508	440	-68
West Yorkshire (Met County)	187,048	12,470	10,970	-1,500
Bradford	40,994	2,733	2,700	-33
Calderdale	15,450	1,030	670	-360
Kirklees	27,604	1,840	1,700	-140
Leeds	81,164	5,411	4,300	-1,111
Wakefield	21,218	1,415	1,600	185

- 4.14 Although a summary of the Government projections, the Council have been unable to agree these figures and no explanation has been provided as to why. This, DLP believe, demonstrates that the Council's approach is not an objective one.
- 4.15 DLP are of the opinion that the difference between the 2008 household projections and the 2004 based requirements in the wider region means that the assumption on levels of net in migration to Selby are underestimated.
- 4.16 In terms of patterns of migration, DLP established in their original submissions that Leeds and York are the most important settlements, and the table above suggests an increasing level of under provision in these two cities unless there is an agreement for these cities to increase the numbers of dwellings to be provided locally above that in the RSS. To date both cities have published reports arguing for lower levels of provision than the RSS.

The population projections

The 2008 Sub National Population Projections

- 4.17 The 2008 based household projections above are the national implications of the 2008 SNPP.
- 4.18 The recently published SHMA however has revisited these 2008 based SNPP and used these to model the housing requirement for North Yorkshire. The SHMA describes the SNPP 2008 as the "Core Scenario" and this suggests an annual dwelling requirement of 596 (SHMA figure 7.14). This is reduced to an annual rate of 547 taking into account vacant stock (SMHA figure 7.15). The SHMA describes the trend based scenario as "representing the most robust approach in calculating potential future demand" although it goes onto state

that the last few years have shown the impact of external factors (SMHA paragraph 7.165).

- 4.19 The SHMA also models a natural change scenario (190 dwellings a year) and an Employment led scenario (403 dwellings a year) both of which use the 2008 SNPP as a base. The SHMA does not use either of these scenarios in the later part of their analysis on housing need but uses the figure of 547 dwellings a year which assumes a successful policy on reducing vacancy.
- 4.20 DLP would conclude that the “objectively” assessed dwelling requirement in the SHMA is 596 dwellings a year.
- 4.21 This is the figure against which the Inspector can consider the impact of policies including the policy to reduce vacancy.

The 2010 Sub National Population Projections

- 4.22 The most recent population projections are the 2010 based Sub National Population Projections.
- 4.23 The summary of these projections are given in Table 7 below:

Table 7 Selby: Summary of SNPP 2010 for the period 2011 to 2026

Selby	Persons
Total migrants	10,800
Total international migrants	1,700
Average migration	720
Total population at start	83,200
Total population at end of period	97,900
Total population change 2011 to 2026	14,700

- 4.24 Table 8 below sets out the differences between the population projections that were used to inform the RSS (the 2004 based), those which are the basis for the 2008 household projections and the most recent release.

Table 8 Selby: Comparison of SNPP of 2004, 2008 and 2010 for the period 2011 to 2026

Selby	Persons		
	2004	2008	2010
Projection year			
Total migrants	10,200	12,100	10,800
Total international migrants	859	1,600	1,700
Ave migration	680	807	720
Total population at start	82,300	83,100	83,200
Total population at end of period	93,200	98,200	97,900
Total population change 2011 to 2026	10,900	15,100	14,700
Difference from 2004 projection due to change in migration	0	1,900	600
Difference from 2004 projection not due to migration	0	2,300	3,200

- 4.25 The difference between the total population at 2026 between the 2008 SNPP and the more recent 2010 SNPP is 300 persons.

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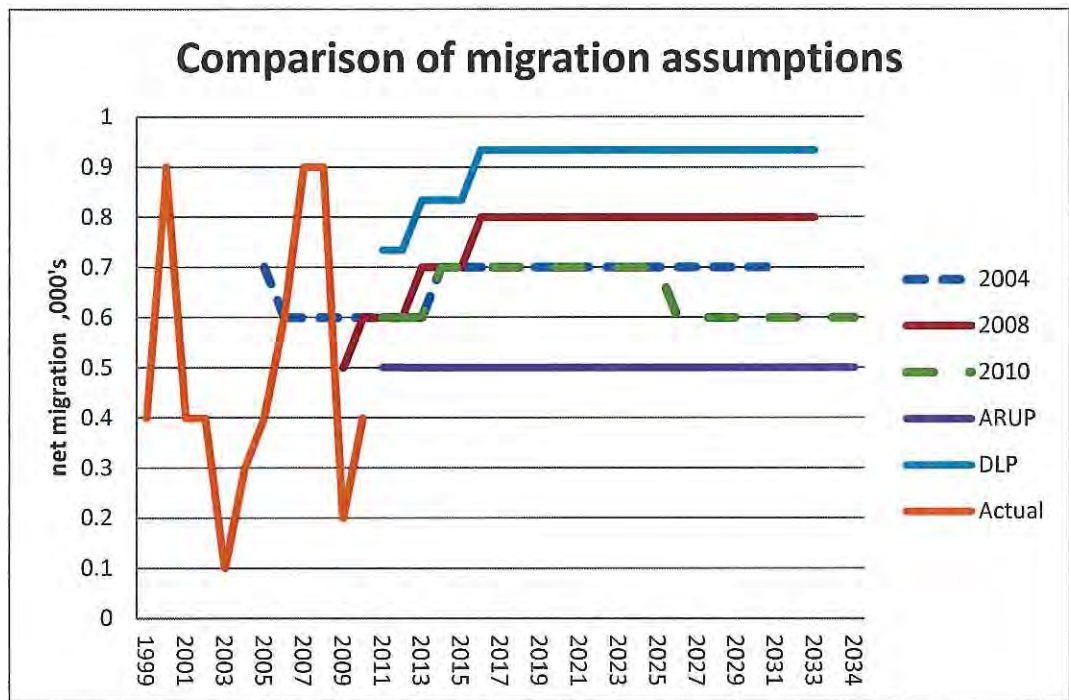
- 4.26 Although a summary of the Government projections, the Council have been unable to agree these figures and no explanation has been provided as to why.
- 4.27 Originally the Council argued that the 2004 projections were the most robust because the migration rates contained within them were more representative of the future pattern of migration. The above table demonstrates that the levels of migration used in the 2004 and 2010 projections are very close, and as such the Council have now changed their position and are arguing that the 2004, 2008 and 2010 population projection have all used a level of migration that is too high and that a reduced level of migration should be used.
- 4.28 The Council's analysis does not take into account the impact of the known policies being pursued by York and Leeds despite having the same consultant advising on this matter.
- 4.29 The approach DLP have taken is that the NPPF requires an objective consideration of migration. Despite the original statements of the Council's consultant the migration levels in the 2004 and 2010 household population projections are not significantly different and as such there is a strong case to use the resulting level of housing.
- 4.30 The evidence in Table 6 and calculated in detail in DLP's Matter 3 submission is that the consequences of the more up to date assessment of housing demand and need in the surrounding areas are most likely to have the impact of increasing rather than decreasing net migration.
- 4.31 DLP also note that while the migration is lower in the 2010 based projections the final population is very similar to the 2008 projections. This would strongly suggest that the 2008 household projections may also be given some weight in determining the overall level of housing.

Summary regarding migration

- 4.32 The past levels of net national migration are set out in the chart below. These record moves within the United Kingdom and do not take into account losses or gains from international migration.
- 4.33 This shows the two peaks of net in migration of 900 persons occurred in 1990 and again in 2007 and 2008.
- 4.34 The lowest level of out migration occurred in 2008 and the lowest level of in migration occurred in 2009. Both in and out migration levels have started to increase since these lows.
- 4.35 This chart does not include net international migration and it is this which is the difference between the chart and the figures in the agreed statement. They are also end of year rather than mid-year. Both sets of figures are correct in our view being published by the government.
- 4.36 This chart is different to that in the SoCG which is based upon mid-year figures rather than end of year. The Council have provided no explanation as to why mid-year figures are preferred and why it was insisted that the mid-year figures were included as opposed to these. Both are from the same Government source.
- 4.37 The chart below shows the migration assumptions for the three SNPP of 2004, 2008 and 2010.

- 4.38 This chart also includes the position of the Council that net migration will decrease to an average of 500 persons per year. This is lower than the SNPP assumptions.
- 4.39 The chart also illustrates the potential impact of what they consider is the known level of planned undersupply in Leeds and York as set out in detail in DLP's submission on Matter 3 (August 2011).
- 4.40 The chart below simply illustrates the published data but includes the DLP and Council proposed levels of migration which could not be agreed with the Council. No reason has been given for not agreeing these facts.

Chart showing migration assumptions for Selby



- 4.41 The average level of migration into Selby for each of the projections during the plan period is set out below in table 6. Again the Council could not agree to the table below or the chart above but no reasons were given.

Table 9 Summary of migration assumptions on the SNPP

net migration	Average migration
SNPP 2004	670
SNPP 2008	752
SNPP 2010	648
ARUP	500
DLP	904

Assumptions on household size

- 4.42 Household projections as produced by the CLG and the Chelmer model do not use average household size to generate assessments of housing need.
- 4.43 The average household size for the whole of North Yorkshire at 2026 will be 2.18 according to the 2008 household projections.

- 4.44 The average household size as generated by the model used in the SHMA (appendix 8 fig 6.5) was 2.41 in 2008 which is forecast to reduce to 2.26 in 2026.

Table 10 Extract from Table 404 of the 2008 Household projections by household type and region, England, 2001-2033 for Yorkshire and the Humber:

Year	All households (as defined in the census) ('000,s)	Private household population ('000,s)	Average household size (persons/ household)
1991	1987	4859	2.45
2001	2069	4892	2.36
2002	2086	4918	2.36
2003	2100	4944	2.35
2004	2119	4982	2.35
2005	2143	5025	2.35
2006	2164	5060	2.34
2007	2184	5094	2.33
2008	2203	5130	2.33
2013	2339	5349	2.29
2018	2485	5569	2.24
2023	2623	5787	2.21
2028	2755	5995	2.18
2033	2879	6179	2.15

- 4.45 The Council have been unable to agree the above extract from the Government publication.

Assumptions on Vacancy

- 4.46 The DLP work and the North Yorkshire SHMA have been based on a vacancy level in the total stock of housing of 3%. The Council have not been able to agree an appropriate level of vacancy.

Economic forecasts

- 4.47 The SHMA suggest that there an increase of jobs in the district in the period of 1,100 with almost half (500 new jobs) being created in the first year 2011/12 (SHMA appendix 8 figure 3).
- 4.48 The Council have referred to unpublished figures from the Regional Economic Model. DLP have requested the details of this model but this has been refused. We have made alternative enquires amongst other consultants who have in the past used the model or work with it and as a result of these enquires DLP would strongly object to any weight being given to the output of this model as there are serious questions as to its appropriateness and its current operation.
- 4.49 DLP consider that economic projections which extend the current recession over the whole of the plan period to be unrealistically pessimistic. Such an approach is in direct conflict with paragraph 7 of the Framework to building a strong responsive and competitive economy.

Impact on commuting patterns

- 4.50 The Council claim in their Position Statement that the justification for a lower level of housing provision is to reduce commuting (paragraph 3.8) and places

this objective higher than meeting the nation's housing needs. DLP would dispute that this is the correct balance; nevertheless it is important for the Inspector to note that the Council have not produced any evidence as to what the impact of providing the higher level of housing would be in terms of impact on commuting.

- 4.51 Table 11 below sets out the increase in the working age population from the 2010 based projections. In calculating the additions to the labour force the economic activity rate from the SHMA has been used.

Table 11 Change in working age population and future workers as a result of the 2010 base SNPP

AGE GROUP	2010	2026	change	change in working age population	Additional workers (SHMA 74.4% appendix 8 figure 3 10)
0-4	5000	5300	300		
5-9	4600	5800	1200		
10-14	5000	6200	1200		
15-19	5400	5500	100	100	74
20-24	4200	3600	-600	-600	-446
25-29	3900	4300	400	400	298
30-34	4300	5500	1200	1200	893
35-39	5800	6700	900	900	670
40-44	6600	6500	-100	-100	-74
45-49	7100	5900	-1200	-1200	-893
50-54	6100	6200	100	100	74
55-59	5500	7100	1600	1600	1190
60-64	5900	7200	1300	1300	967
65-69	4300	6100	1800		
70-74	3300	4900	1600		
75-79	2600	4800	2200		
80-84	1800	3200	1400		
85-89	1100	1900	800		
90+	600	1300	700		
All ages	83200	97900	14700	3700	2753

- 4.52 This information demonstrates that meeting the 2010 based SNPP will not lead to a large increase in the workforce and for some age groups notably the 20 to 24 and the 40 to 49 there will be a decrease in the number of workers.
- 4.53 The pessimistic employment projections in the SHMA suggest an increase over the plan period of 1,100 (Figure 3. 11: Forecast New Job Creation, Selby, 2011 to 2026). This would suggest that meeting the 2010 based projections could potentially result in some 1,653 additional commuters traveling outside of the districts boundary.
- 4.54 Table B of Background Paper 1 (January 2007) sets out that of the 38,814 workers who lived in Selby that travelled to work some 18,946 crossed the

district boundary to work. It should be noted that at this time there were only 31,365 people working in Selby (residents plus in commuters).

- 4.55 The overall increase in journeys out of the district based upon this evidence will be under 9%. The largest additional flow (on a pro rata basis) would be an additional 554 movements into Leeds in addition to the 6,350 recorded in 2001.
- 4.56 It is DLP's view that even if this was to be the impact of meeting the 2010 based housing requirement then it is not possible to conclude that this change is significant and that its effect demonstrably outweighs the benefits of providing the required level of dwellings.
- 4.57 If we are incorrect in the assessment of the significance of this impact, then paragraph 152 requires three tests to be passed before a lower housing requirement can be set.

Alternative locations

- 4.58 It has been DLP's stated position that increasing the level of provision in Sherburn in Elmet would increase the sustainability of the Core Strategy. In terms the potential increase of some 554 additional job related movements to Leeds this still seems to be a very appropriate strategy. This is because the settlement is well served by public transport to Leeds, and as such development here will provide a real choice of modes of transport in accordance with paragraph 29 of the Framework. Being closer to Leeds the settlement will reduce the travel distance and hence minimise the length of journey to work in accordance with paragraph 36 of the Framework.
- 4.59 DLP understands that the earlier proposed strategic site to the west of Selby now has a developer involved. That developer is in the process of resolving the access issues that were identified in the SHLAA relating to the site. In this respect the question marks over the deliverability of that land are being resolved and such growth should be encouraged as it would provide suitable for housing for workers in Selby in particular.
- 4.60 Other alternative locations for housing would be either in Leeds or York but the Council have not entered any discussions with these Councils about these cities accommodating a higher level of provision to allow Selby to reduce its migration.

Mitigation

- 4.61 The impact of additional number cross boundary movements could be mitigated by placing development close to the boundary of Leeds and York shortening the distance travelled or by increasing concentrations of development at sustainable transport hubs.
- 4.62 By locating development in areas which themselves have a high degree of service and employment provision (like Sherburn in Emmett) travel distance to other facilities could reduce and a wider choice of transport modes would be on offer.
- 4.63 There is of course the ability to use Travel Plans to also address the impact of all patterns of travel generated by the development. This might include enhanced provision of non-car modes.
- 4.64 Lastly the impact could be mitigated by reducing the level of in commuting to Selby from Wakefield (2,951 in commuters), Leeds (1,717), East Riding (1,733 in commuters) and York (1,682 in commuters). The figures for in

commuting are from Table B of Background Paper 1 January 2007. This could be achieved by providing suitable housing for these workers to live and work in Selby.

Compensation

- 4.65 The impact on the environment in terms of increased numbers of out commuters could be compensated by encouraging a higher degree of fuel efficiency within the new developments.

5 A review of recent decisions by the Planning Inspectorate on appeals and development plans

5.1 Appeal Decision APP/X1165/A/11/2165846 paragraph 52 considered the competing claims as to the reliability of each of the projections including the 2003 based projections and concludes:

Taking all of this into account, I consider that it would be unreasonable not to reduce the Proposed Changes version of the RS housing requirement figure to reflect the more recent evidence of the 2008-based CLG household projections, but premature to attempt to calculate any further reduction based on the raw data provided by the ONS population projections. In my judgment the CLG 2008-based household projection figures constitute the most reliable up-to date figures, and therefore the best evidence on which to base my assessment of Torbay's housing supply position. I share the appellant's view that it is reasonable to apply an increase of 6%, in order to translate the number of projected households into the number of dwellings required, taking account of vacancies and occupation as second

5.2 Appeal Decision APP/X1165/A/11/2145178 paragraph 63 also considered the competing claims as to the reliability the projections and states:

In contrast to the circumstances surrounding the future of the RSS, the DCLG household projections (2008 to 2033) are both Current and of relatively recent origin. I have no reason to doubt their reliability.

The approach taken in Central Lancaster

5.3 The Central Lancaster Core Strategy proposed to lower the level of housing provision below that set in the RSS and the Inspector clearly indicated that this would result in the plan being unsound. While not reported in the decision letter the background to this is significant because the Inspector did consider the impact of the 2008 based projections.

5.4 In the case of Central Lancaster Core Strategy paragraph 8.7 of the consultation document refers to the household projections. The CS concluded that because the 2008 based household projections are lower than the 2006 based projections there is justification to review the housing requirement as set out in the RSS. However, it was the 2003 based projections which informed the final RSS requirement. This is confirmed in paragraph 6.30 of the RSS Panel Report (Appendix EPP1). The 2003 based projections indicated an increase of 1,318 net additional households per annum (2004 to 2026). The latest 2008 based projections indicate that the number of households in Central Lancashire is set to grow from 145,000 in 2008 to 168,000 in 2026. This equates to growth of 23,000 households, or 1,278 net additional households per annum. This is a 4.7% reduction from the 2003 based figure which the Inspector did not consider to be a material difference and the Inspector did not seek to reduce the housing requirement on the base of this evidence.

The approach taken in North Somerset (prior to the Framework)

5.5 The North Somerset Core Strategy proposed to lower the level of housing provision below that in the draft RSS and while the Inspector accepted this argument (paragraph 29 of decision notice) based upon the impact of the economic recession he only did so because in the short term there was an additional supply of 3,000 potential dwellings identified in the SHLAA (paragraph 30) and on the understanding that improvements to the economy would require very significant changes to the Core Strategy (paragraph 31).

These changes would require a comprehensive review of the Core Strategy and cooperation with neighbouring authorities.

- 5.6 The Inspector was very clear that this comprehensive review was required to be undertaken within the next 5 years (paragraph 32).

6 Summary of DLP planning's position

- 6.1 DLP's approach to the setting of the housing requirement is that the requirement should be objectively assessed according to the Framework. Once this has been undertaken then any reduction should be based upon an analysis of the negative impact of providing that higher level of development. Only if this analysis identifies a significant impact which demonstrably harms the objectives of sustainable development, which cannot be resolved by a change in the strategy in terms of distribution, mitigated against or compensated, should the figure be reduced.
- 6.2 DLP have calculated that the 2010 SNPP for Selby to be 581 dwellings a year (see table 12 below).
- 6.3 DLP argue (paragraphs 3.3.5 to 3.3.11 of their original submission on matter 3) for the higher level of in migration based upon the approach being adopted towards housing provision in the surrounding areas compared to the most recent (2008 based) Household Projections. The two authorities which have strong links to the district in terms of migration are Leeds and York. The calculated impact of the undersupply suggests that Selby's proportion of the increased level of net out migration that would result would be 134 persons a year (89 persons a year from Leeds and 45 persons a year from York).
- 6.4 The impact of the 2010 SNPP on these two locations are set out in the tables 12 and 13 below. Table 12 uses the average household size from the relevant SHMA while table 13 uses the average household size for the published 2008 household projections as published by the Government. Both tables suggest that there is / will be an undersupply in both Leeds and York if the current policy positions remain changed.
- 6.5 DLP are of the opinion that having established substantial migration flows between Selby, York and Leeds the consequences of these flows must be objectively assessed if the CS is to be found in accordance with the Framework and hence sound.
- 6.6 DLP have assessed the potential impact of increasing the housing supply in terms of increased commuting above and even using the "pessimistic" level of employment growth in the SHMA, the impact cannot be regarded as significant.
- 6.7 In addition DLP have identified how this limited adverse impact can be reduced by small amendments to the Core Strategy as well as mitigation and compensation measures.
- 6.8 The above represents an objective assessment of the districts housing needs in full accordance with the Framework.

Table 12 Implied housing requirements from SNPP 2010 utilising average household size from SHMA for Selby and York

	total population at 2011 (2010 based)	total population at 2026 (2010 based)	average household size	436059.1133	vacancy rate in total stock	total dwellings required including 3% vacancy	total dwellings at 2011 (CLG live table 100)	Inferred dwelling requirement using average HH size	Inferred annual dwelling requirement	Proposed dwelling requirement in emerging plans	under/oversupply compared to 2010 SNPP
Leeds*	789,000	885,200	2.15	411,721	3	424,073	336,880	87,193	5,813	4,300	-1,513
Selby	84,100	97,900	2.26	43,319	3	44,618	35,900	8,718	581	450	-131
York	198,700	216,800	2.11	102,749	3	105,831	83,900	21,931	1,462	782	-680

* Leeds SHMA - Figure 6.2: Population, household size and household estimates for 2010 and 2026
+ North Yorkshire SHMA average Household size from figure 7.5

Table 13 Implied housing requirements from SNPP 2010 utilising average household size

	total population at 2011 (2010 based)	total population at 2026 (2010 based)	average household size	total occupied dwellings at 2026	vacancy rate in total stock	total dwellings required including 3% vacancy	total dwellings at 2011 (CLG live table 100)	Inferred dwelling requirement using average HH size	Inferred annual dwelling requirement	Proposed dwelling requirement in emerging plans	under/oversupply compared to 2010 SNPP
Leeds	789,000	885,200	2.18	406,055	3	418,237	336,880	81,357	5,424	4,300	-1,124
Selby	84,100	97,900	2.18	44,908	3	46,256	35,900	10,356	690	450	-240
York	198,700	216,800	2.18	99,450	3	102,433	83,900	18,533	1,236	782	-454



7 Conclusion

- 7.1 DLP consider that in policy terms the Core Strategy should be in full accordance with the Framework.
- 7.2 DLP have calculated that the 2010 SNPP for Selby to be 581 dwellings a year (Table 12).
- 7.3 DLP continue to argue that the Framework requires Plans to be prepared and approved in the full knowledge of the consequences not only for the district but also the surrounding areas. In this case the known policy positions of York and Leeds cannot simply be ignored. The failure of the Council to even engage in agreeing the basic facts regarding the levels of provision and need in these two locations mean that their simple assertions that policies regarding housing supply between these locations are not related cannot be given weight. There is clear evidence that the housing markets of York, Leeds and Selby are interconnected and that the evidence produced to date to demonstrate that there is adequate cooperation between these authorities to ensure housing demand and need is met in full as required of the Framework.
- 7.4 Taking into account the impact of the undersupply in Leeds and York suggests that Selby's proportion of increased out migration from these locations would result in a higher dwelling requirement of approximately 600 dwellings a year.
- 7.5 This figure has been tested in terms of impact on commuting patterns which the Council suggest is the reason for a lower level of provision. It has been demonstrated that the impact is not significant enough to outweigh the clear benefit of housing the nation's population. Furthermore it has been suggested from the beginning of the Examination that a higher level of provision in Sherburn in Elmet could have benefits in terms of more sustainable patterns of travel to work by both shortening distances and increasing choice of travel mode. The impact of possible increased movements across the boundary of the district for work may be both mitigated and compensated. In these circumstances there should be no reduction from the objectively assessed demand and need.
- 7.6 The approach undertaken by the Council is not in accordance with the Framework for the following reasons:
 - a. The Council have not approached the plan in terms of positively seeking to meet the development needs of the area; it has chosen to undersupply according to their own assessment of the most recent projections without setting out how meeting the higher level would significantly and demonstrably outweigh the benefits.
 - b. There is no agreed evidence base for the Housing Market Area or the impact of policies in Leeds and York
 - c. The level of housing provision is based on a reduced level of migration compared to the projections and the Council have provided no evidence that they have sought to accommodate these migration levels by adopting a different policy within the plan or by negotiating that these will be accommodated at their source locations or indeed alternative destinations.

- d. The level of housing has been reduced without defining the extent of the claimed impact in terms of increased commuting or considering mitigation or compensation measure to address this alleged impact.

7.7 In light of the above the choice for the Inspector is to:

- a. Conclude that differences are too small to matter, or that a reduction of housing in Selby does not have to be made up elsewhere. This would mean that the tests set out in paragraph 14 and 152 which Councils are to undertake before decreasing supply are easily passed and require little evidence.
- b. Increase the dwelling requirement. It is accepted that this may require further delay as consultation takes place but is the preferred option.
- c. Approve, but request early review of the Core Strategy to better accord with the Framework; it is difficult to see the advantage of this approach. The North Somerset Core strategy was different in this respect as the duty to cooperate that was so obviously missing and hence the requirement for a quick review was only in the legislation at that time. There is now a policy requirement to cooperate throughout the plan process as set out in the Framework and it is clear this has not been undertaken. There is little indication that cooperation in any meaningful sense will come forward for an early review.
- d. Find the CS unsound. While this is not a preferred option it may be the only way that the Inspector can signal the importance of applying the whole of the Framework.