



Selby District Core Strategy

Regulation 30 Statement

Summary of Representations Received

May 2011



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1.0 Introduction

- 1.1 Selby District Council published its Submission Draft Core Strategy Development Plan Document (Publication Version) on 10 January 2011 to allow the local community and other stakeholders to make representations on its legal compliance and soundness.
- 1.2 The Core Strategy Submission Document and supporting evidence, including The Final Sustainability Appraisal Report, Final Appropriate Assessment (Habitat Regulations Assessment), draft Consultation Statement, draft Infrastructure Delivery Plan, and a series of Background Papers were available to view at Access Selby and other Council offices and local libraries.
- 1.3 These documents were also available on the Council's website, together with additional evidence base material.
- 1.4 Specific consultees received a CD Rom containing the documents. Other consultees were notified by e-mail or letter informing them where to view the documents and including details about the representations period. Notice was also given in local newspapers.
- 1.5 The period for submitting representations ran from Monday 10 January 2011 until Monday 21 February 2011, and representation forms and guidance notes were available in both electronic and paper formats.
- 1.6 This Statement has been prepared in accordance with Regulation 30 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, in order to provide a summary of:
- The number of representations received on the submission draft Core Strategy, and
 - The main issues raised by the representations received.

2.0 Representations

- 2.1 During the representation period a total of 586 representations were received from 61 organisations and individuals. Table 2.1 below summarises the number of representations received for each section/policy of the Core Strategy.

Table 2.1 Representations Received on the Submission Draft Core Strategy (Publication version)		
Chapter		Representations Received
General Comments on the Core Strategy		28
Chapter 1	Introduction	13
Chapter 2	Key Issues and Challenges	33
Chapter 3	Vision, Aims and Objectives	35
Chapter 4	Spatial Development Strategy *	163
Policy CP1	Spatial Development Strategy / paras 4.1 - 4.41	138
Policy CP1A	Management of Residential Development in Settlements / paras 4.42 - 4.49	23
Chapter 5	Creating Sustainable Communities *	196
Policy CP2	The Scale and Distribution of Housing / paras 5.1- 5.28	75
Policy CP2A	Olympia Park Strategic Development Site / paras 5.29–5.39	18
Policy CP3	Managing Housing Land Supply / paras 5.40 -5.55	20
Policy CP4	Housing Mix / paras 5.56 – 5.70	13
Policy CP5	Affordable Housing / paras 5.71 – 5.94	39
Policy CP6	Rural Exception Sites / paras 5.95 – 5.98	9
Policy CP7	The Travelling Community / paras 5.99 – 5.109	8
Policy CP8	Access to Services, Community Facilities and Infrastructure / paras 5.110 – 5.126	14
Chapter 6	Promoting Economic Prosperity *	47
Policy CP9	Scale and Distribution of Economic Growth / paras 6.1– 6.31	30
Policy CP10	Rural Diversification / paras 6.32 – 6.37	3
Policy CP11	Town Centres and Local Services / paras 6.38 – 6.64	12
Chapter 7	Improving the Quality of Life *	60
Policy CP12	Sustainable Development / Climate Change / paras 7.4-7.34	21
Policy CP13	Improving Resource Efficiency / paras 7.35 – 7.56	18
Policy CP14	Low-carbon and Renewable Energy / paras 7.57 – 7.70	5
Policy CP15	Protecting and Enhancing the Environment/paras 7.71 – 7.84	9
Policy CP16	Design Quality / paras 7.71 -7.84	4
Chapter 8	Implementation	11
Total		586

* including comments on the introduction to the chapter and comments on the chapter generally

2.2

Table 2.2 below sets out how many of the 586 representations considered that the Core Strategy was legally compliant and sound/unsound, although it should be noted that many respondents did not specify whether they considered the document to be legally compliant or sound/unsound.

Table 2.2 Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
256	56	274
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
83	257	246

- 2.3 To be sound a DPD must be justified, effective and consistent with national policy. Table 2.3 outlines the number of representations made against each test of soundness, bearing in mind that consultees were able to select more than one test of soundness when making representations. In such cases consultees were asked to complete a separate sheet for each test of soundness they considered a policy, paragraph or other part of the Core Strategy to fail on, although many respondents did not or were unable to indicate which of the 3 main tests applied.

Table 2.3 Number of Reprs Made Against Each Test of Soundness		
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
144	69	44

- 2.4 A full set of representations is being submitted alongside the Core Strategy as part of the Council's Consultation Statement. The representations will also be available to view at Access Selby, and other Council Offices and local libraries, and on-line at www.selby.gov.uk
- 2.5 The key issues raised by the representations are summarised in the following sections based on individual sections / policy headings.

3.0 General Comments

- 3.1 During the representation period a total of 15 comments and observations were received from organisations and individual stakeholders about the Core Strategy generally, which cannot be assigned to specific sections or policies. These include comments on the explanatory statement concerning the intended abolition of Regional Spatial Strategy at the beginning of the document. Table 3 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 3 General Comments - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
7	1	7
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
2	4	9
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
1	3	0

Issues Raised

- 3.2 In response to recent court decisions regarding the status of RSS, and the Government's stated intention to abolish RSS and introduce changes to the planning system through the Localism Bill, the Council incorporated an explanatory statement at the beginning of the Core Strategy. The explanatory statement has attracted a small number of mostly favourable comments.
- 3.3 One respondent however considers the statement is flawed for the following reasons:
- the strategy is not consistent with RSS and the RSS evidence base.
 - reference to the LGYH letter of conformity is misleading because this is based on the previous consultation draft version of the Core Strategy prior to the amendment of Policy CP1 and inclusion of a new policy CP1A.
 - the Council have not demonstrated that the Core Strategy and its evidence base is the most appropriate having evaluated reasonable alternatives.
 - The evidence base is not locally justified and out of date, and
 - The Core Strategy takes evidence from RSS and applies it in policies which have no consistency with RSS.
- 3.4 The respondent suggests that the Council should either start afresh with an evidence base drawn from local needs, or alternatively ensure the Core Strategy is fully compliant with RSS, and with housing growth which meets local needs.
- 3.5 Another group of respondents consider that the evidence base should be updated with more recent ONS data.
- 3.6 Other criticisms are that the cumulative impact of Core Strategy policies have not been assessed through the Sustainability Appraisal, lack of coherence with other strategies, no evidence of a 'duty to co-operate' with other Local Authorities, and that the document is too large.
- 3.7 It is also pointed out that the terms 'speculative' and 'windfall' are used interchangeably throughout the document and it could be argued that not all windfall development is speculative in nature.

4.0 Chapter 1: Introduction

- 4.1 A total of 13 comments and observations were received from organisations and individual stakeholders in relation to the Introduction to the Core Strategy. Table 4 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 4 Introduction - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
9	1	3
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
0	4	9
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
1	2	1

Issues Raised

- 4.2 Comments relate mainly to the individual stages of the preparation process.
Consultation on Interim Housing Policies (2007)
- 4.3 One respondent considers that the Council has expressed misplaced concern (para 1.8) for the potential impact of continuing high levels of housing completions on the overall aims of the Regional Spatial Strategy. In particular it is suggested that the early release of a Selby District Local Plan Phase 2 housing allocation at Sherburn in Elmet would not prejudice the aims of the Plan as it is a designated Local Service Centre. The respondent considers that the Strategy in its current form fails to provide an adequate spatial focus on the larger settlements.
Interim Housing Policy (2010)
- 4.4 Another respondent considers that the Council should not have relied on responses to the consultation on the proposed 2010 Interim Housing Policy in revising the Core Strategy because the IHP was not supported by a Sustainability Appraisal or by an evidence base, and an assessment of alternatives. It is suggested that because the Council has not published the responses to the IHP (which the Council has decided not to proceed with) it is not possible to judge whether the balance of the responses is in favour of the proposed policy. It is further suggested that the Core Strategy is unsound on effectiveness grounds because it relies on comments relating to the Interim Housing Policy consultation exercise although there is no evidence that delivery partners signed up to it. For these reasons it is suggested that the Core Strategy is not in accordance with PPS12 guidance.

Publication Stage

- 4.5 One respondent expresses concern about the limited scope for making further amendments in response to comments received at 'Publication' stage. It is suggested by this respondent that the Council should make amendments where the policies are not legally compliant or demonstrably unsound.

Submission Core Strategy

- 4.6 A small group of respondents suggest that reference should be made in paragraph 1.23 to the intended abolition of the Regional Spatial Strategy rather than its revocation. They also welcome the inclusion of a reference to the possibility of the Council undertaking a partial review of the Core Strategy once details of the new planning system are available, but also request more flexibility in the current Strategy.

5.0 Chapter 2: Key Issues and Challenges

- 5.1 During the representation period a total of 33 comments and observations were received from organisations and individual stakeholders in relation to Key Issues and Challenges. Table 5 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 5 Key issues and Challenges - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
16	1	16
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
4	8	21
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
6	1	1

Issues Raised

- 5.2 A small number of respondents comment favourably on the inclusion of additional descriptive text to provide a proper context for the Strategy and core policies, in response to comments submitted at the previous stage. Similar comments are made concerning the inclusion of additional maps and diagrams which improve the readability of the document. Some additional amendments and diagrams are also suggested.
- 5.3 Other comments relate to the District Portrait and the Key issues and Challenges:

District Portrait

Tadcaster

- 5.4 Two respondents challenge the comment made in para 2.24 that a 'conservation led approach' has restricted development in Tadcaster and affected the viability of the centre.

Key Issues and Challenges

- 5.5 One respondent suggests strengthening the wording of para 2.38 by ensuring that assessed development needs are met in a way which safeguards environmental assets.

Concentrating Growth on Selby

- 5.6 One respondent disputes the use of RSS 2004 based projections, and considers more growth should be focused on villages immediately around Selby because of flood constraints in Selby and the demonstrable need for more growth in villages. Conversely a small number of respondents have reservations about whether concentrating the level of growth proposed in the Selby area is the most sustainable solution.
- 5.7 One respondent suggests flood risk should be identified as a key issue in its own right.

Provision of Affordable Housing

- 5.8 A small group challenge the assertion that Selby has a weak housing market as current circumstances are temporary in nature. They suggest that the identified need for 400 affordable units per annum does not sit comfortably with a 440 dpa target.
- 5.9 Another respondent considers affordable housing provision should reflect need identified across the District rather than being concentrated in Selby.

6.0 Chapter 3: Vision, Aims and Objectives

- 6.1 During the representation period a total of 35 comments and observations were received from organisations and individual stakeholders in relation to the Vision and Objectives. Table 6 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 6 Vision, Aims and Objectives – Legal Compliance and Soundness

Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
13	6	16
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
7	11	17
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
7	2	2

Issues Raised

Vision

- 6.2 While a number of respondents support the overall vision one considers the vision is too generalised, and another feels that growth should not just be focussed on the market towns, because sustainable development is achievable in smaller settlements
- 6.3 There is also a suggestion that the vision should be at the beginning of the document and that the paragraphs detailing the history of the Core Strategy should be deleted. The same respondent considers that more evidence needs to be produced to demonstrate how the economy will be diversified.

Aims

- 6.4 One respondent considers the Core Strategy fails to support growth at a number of sustainable locations. Another considers (para 3.2) it should be extended to cover a twenty year period, rather than 15 years, having regard to the need to amend Green Belt boundaries and provide additional safeguarded land.

Objectives

- 6.5 Specific expressions of support have been received regarding Objective 11 (Protection of the Historic Environment) particularly the acknowledgement of the contribution that this makes to economic prosperity and local community well-being, Objective 12 (High Quality Design), Objective 13 (Cultural and Leisure Opportunities), Objective 14 (Green Infrastructure), and Objective 17 (Protecting the Wider Countryside).
- 6.6 Objectives 1, 2, 5, 6, 7, 8, 9, and 15 are the subject of individual comments to the effect that :-
- Objective 1 (Enhancing the Role of the Market Towns) and Objective 5 (Housing Mix), should reflect the increasing emphasis on catering for housing demand rather than need.
- Objective 2 (Rural regeneration) should be widened in scope to support growth in secondary villages.

Objective 6 (Flood Risk) should be more closely aligned with PPS25 to ensure the most suitable sites in areas of lowest flood risk are prioritised.

Objective 7 (Efficient Use of Land)

- should be expanded to include the re-use of buildings as well as development on previously developed land in order to help reduce the amount of waste from construction and demolition, and
- should include reference to ‘appropriately remediated’ previously developed land in order to comply with PPG14.

Objective 8 (Minimising the need to Travel) – considered that minimising the need to travel has not been adequately covered.

Objective 9 (Developing the Economy) –

- should be given a higher priority in the list of objectives,
- reference should be made to removing ‘barriers to growth’, and
- should identify how the power industry can contribute to promoting economic prosperity.

Objective 15 (Making Best Use of Natural Resources) should be supplemented and should refer to ‘low carbon and /or renewable energy operations’ to reflect the advice in PPS1.

6.7 Additional objectives on farming, education and security are also suggested.

7.0 Chapter 4: Spatial Development Strategy (incl policies CP1 and CP1A)

Settlement Hierarchy (paragraphs 4.1 – 4.12), Spatial Development Strategy (paragraphs 4.15 – 4.41), and Policy CP1.

7.1 A total of 138 comments and observations were received from organisations and individual stakeholders on the settlement hierarchy and spatial development strategy, including Policy CP1. Table 7 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 7.1 Settlement Hierarchy / Spatial Development Strategy / Policy CP1 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
62	14	62
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
20	62	56
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
37	9	16

Issues Raised

General / Settlement Hierarchy

- 7.2 There are a range of responses to the introductory paragraphs and the section describing the settlement hierarchy, namely paragraphs 4.3, 4.5, 4.7-4.10, 4.13, the Key Diagram and paragraph 4.14. Although the views expressed cover a range of issues a number of respondents indicate a need to update the references to the regional context in Paragraph 4.3. There is a degree of support for the Settlement Hierarchy and for particular villages. There are no objections to the general classification but there are a number objecting to the selection of individual Designated Service Villages. No particular village stands out in this respect.
- 7.3 The main area of comment on the Key Diagram revolves concerns the Strategic Gaps and the relationship of the three villages of Barlby, Brayton and Thorpe Willoughby to Selby.

Spatial Development Strategy

Selby - Paragraphs 4.15 – 4.17

- 7.4 A number of comments made on this section support the focus of development on Selby. The issue attracting the most comments, however, relates to the reference to the neighbouring villages of Barlby, Brayton and Thorpe Willoughby in Paragraph 4.17. Opinion is divided between those who support the potential 'complementary role' of these villages to Selby, because they are more sustainable than other villages as suggested in the Strategy , and those who object to the additional emphasis placed on these villages.
- 7.5 Another response refers to an 'erroneous' reference in Paragraph 4.16 to a second Strategic Development Site to the north-west of Selby. The respondent wishes the paragraph to make it clear that growth around Selby should not be confined to the east and north-west of Selby.
- 7.6 There is also a comment supporting the Strategic Gap between Selby and Barlby in principle, although the respondent also considers that the detailed designation of the Strategic Gap is preventing potential development sites coming forward.

Local Service Centres – Paragraphs 4.18 – 4.24

- 7.7 Two respondents consider the use of the word 'limited' in Paragraph 4.18 presents an unduly negative approach to development in the Local Service Centres. They consider a more positive approach would be more in accordance with Government guidance in PPS1, PPS3 and PPS12. The respondents emphasise the importance of supporting further development in order to improve the general sustainability of both Local service Centres and their ability to serve the local community and their catchments.
- 7.8 There is support for improving services in Sherburn in Elmet (as referred to in Para 4.21) but another representation considers Paragraph 4.19 should also make reference to recent and future employment growth, and cross refer Paragraphs 2.21, 2.28, 6.1 and 6.8 with regard to recent and anticipated employment growth in the Sherburn in Elmet area.

- 7.9 A further response suggests that Paragraph 4.21 is unsound as the evidence from the Strategic Housing Market assessment does not support the statement that there is a strong outward commuting movement from Sherburn.
- 7.10 Another comment on Paragraph 4.23 suggests that rather than promote additional housing to help revitalise Tadcaster town centre, there is a need to create additional employment opportunities to balance out the jobs to population ratio. It is considered that new households not working in Tadcaster will have limited options because of the lack of rail services.

Designated Service Villages – Paragraphs 4.25 and 4.26

- 7.11 Two respondents consider the use of the word 'limited' in Paragraph 4.25 presented an unduly negative approach to development in the Designated Service Villages. They considered a more positive approach would be more in accordance with Government guidance.
- 7.12 One respondent considers Paragraph 4.25 is unsound on the basis that there is insufficient guidance as to how the overall housing target for Designated Service Villages is to be apportioned between the various settlements.
- 7.13 The same respondent also questions the soundness of Paragraph 4.26 because the phrase 'Housing allocations of an appropriate scale will be identified...' is too vague and does not establish a test for the necessary criteria to be considered when judging 'appropriate scale'. The Strategy is therefore considered to be unreasonably flexible in this respect.
- 7.14 However another respondent specifically supports the concept of 'appropriate growth' in DSVs.

Secondary Villages and Countryside – Paragraphs 4.27 -4.29

- 7.15 Two responses consider the proposed approach toward development in rural settlements is too negative, one of whom considers that market and affordable housing, along with employment opportunities are required in all settlements to ensure their vitality and viability.

Other Locational Principles - Paragraphs 4.30 – 4.41

a) Previously developed land

- 7.16 A number of responses comment on Paragraph 4.31 to the effect that it should state, in line with Paragraph 67 of PPS3, that achieving previously developed land targets should not be at the expense of overall housing delivery targets.
- 7.17 A second group of responses comment on Paragraph 4.33 to the effect that the previously developed land target should be extended to cover the whole Strategy period to 2026. They indicate that there is no explanation as to why there is insufficient information to provide a target beyond 2017 and suggest there is insufficient evidence for the pre 2017 target.
- 7.18 Of the remaining responses on this issue one considers the current target to be unrealistic and suggests 30% which would be in line with the target in Hambleton District; while another supports the target and considers the approach provides some flexibility in relation to future site allocations and

reflects the distinctive rural nature of the District.

b) Flood Risk

- 7.19 There are two comments on this issue. One expresses concern that long established housing allocations should not be lost on the basis of 'all embracing' flood risk assessments and that site specific assessments should be made. The other suggests a minor rewording of the second sentence to replace '*suitable sites with a lower probability of flooding are not overlooked.*' with '*suitable sites with a lower probability of flooding are used in preference.*'

c) Accessibility

- 7.20 A number of comments have been made on accessibility. One respondent stresses the importance of accessibility when considering the selection of Designated Service Villages whilst another suggests there should be specific reference to the importance of bus travel within the District and indicate those settlements which have rail stations. A further respondent considers the Core Strategy should identify the most sustainable locations from an accessibility aspect.

d) Green Belt

- 7.21 This issue attracted the most comment of all the locational principles, particularly regarding the issue of Green Belt reviews.
- 7.22 One group of respondents wish to see the wording with regard to Green Belt reviews tightened to indicate that only minor changes will be needed in circumstances where no safeguarded land exists or where land does not meet Green Belt criteria. Another respondent considers there should be greater definition of the approach to be adopted for Green Belt reviews. Another requests the inclusion of a reference to the need to demonstrate exceptional circumstances to justify any alterations.
- 7.23 In contrast one respondent wishes to see more flexibility added to the text which it is considered would make the Core Strategy more effective.
- 7.24 Other responses request specific references to be added to the Selby Allocations DPD in relation to Green Belt reviews, including the potential to add new Green Belt areas as well as remove land.

e) Character of Individual Settlements

- 7.25 A number of comments question the soundness of identifying Strategic Countryside Gaps in the Core Strategy, for example because they are not based on detailed and up to date evidence and should not be shown on the Key Diagram. The same respondents also note that none of the Core Strategy policies include reference to this policy. They consider a landscape and visual assessment needs to be carried out to justify this designation. It is further suggested that the reference in Paragraph 5.23 to the fact that the boundaries may be reviewed at the Site Allocations stage supports the concern that such designations could prejudice future housing sites.
- 7.26 Another respondent supports the reference to a Strategic Gap between Selby and Barby in principle, but also considers that identifying them on the Key Diagram will prevent potential development sites coming forward.

Policy CP1

- 7.27 The majority of comments on this policy refer to specific elements of the

policy, although there are a number which support the policy in general terms. Only one representation objects to the policy in principle and that is on the basis that it fails to deliver a key objective of the plan by allowing disproportionately higher levels of development within the service villages although these are not as sustainable as higher order settlements. Another representation requests that Appropriate Assessments carried out under the Habitat Regulations be referred to within the policy.

Policy CP1 Part A

- 7.28 Mixed views are expressed regarding the role of the two Local Service Centres, one respondent suggesting that more emphasis should be given to development in Sherburn, and another suggesting that Local Service Centres should only provide a level of housing in accordance with local needs, in order to be consistent with RSS.
- 7.29 There are also divided views on the envisaged 'complementary' role of Barlby, Brayton and Thorpe Willoughby to Selby (Part A, a) bullet point three), with a small number of respondents suggesting this could undermine the intended focus on Selby, and another small group supporting the specific reference to the villages and/or calling for greater priority to be given to them.
- 7.30 A number of responses object to the designation of specific service villages, namely Appleton Roebuck, Cawood, Fairburn, Hambleton, Hemingbrough Kellington and Whitley, with Fairburn and Whitley receiving the most comments. Escrick is suggested as an additional DSV by two respondents one of whom also calls for the inclusion of Beal, Barlow, Camblesforth, Cliffe, Stutton and Wistow in preference to Fairburn.
- 7.31 Comments on the remainder of CP1 Part A raise the following issues:
- whether the provisions for development in secondary villages are too relaxed or too restrictive
 - whether reference to 'exception' sites should be omitted in favour of greater provision for small or appropriate scale development
 - whether the scope for development in the countryside adequately reflects national guidance in PPS4, and
 - whether in the absence of RSS and the former North Yorks Structure Plan the Core Strategy should give strategic protection to the general extent of the Green Belt.

Policy CP1 Part B

- 7.32 While a small number of representations provide 'in principle' support for Part B of the Policy it is also suggested (by one) that reference be made within the sequential test to deliverability and availability of sites, and (by another) that greater clarification be provided as to what constitutes 'suitable' greenfield sites within settlements.
- 7.33 Of those making adverse comments a small group consider the sequential approach is an out of date approach originally included in PPG3 but which is no longer referred to in PPS3. They consider that the 'brownfield first' approach takes no account of accessibility criteria eg proximity to services where greenfield extensions may have better access to services than brownfield locations. Another objection is based on the grounds that the Policy does not set out how it will seek to protect the Green Belt by indicating

how greenfield sites within or on the edge of settlements across the District would be released before sites within the Green Belt.

7.34 The last paragraph of Part B refers to the sequential approach to flood risk. One representation objects to the reference to 'achieving vital and sustainable communities' in the last sentence. The respondent considers that the sequential approach should be based on flood risk alone and that other issues should be considered separately.

Policy CP1 Part C

7.35 Comments on Part C of the Policy reflect those made on the associated text paragraphs 4.31 – 4.33. For example one group of responses consider that the previously developed land target should be extended to cover the whole Strategy period to 2026. Another response suggests that as current market circumstances inhibit the bringing forward previously developed land that a target of 30%, in line with that adopted in neighbouring Hambleton District, would be more appropriate.

Management of Residential Development in Settlements

Policy CP1A and accompanying paragraphs 4.42 – 4.49

7.36 A total of 23 comments and observations were received from organisations and individual stakeholders on Policy CP1A and the accompanying text. Table 7.2 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 7.2 Policy CP1A - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
12	1	10
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
5	13	5
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
8	3	2

Issues Raised

7.37 While there is a degree of in-principle support for this policy the main arguments raised against it are:

- in response to para 4.46 that the policy should provide for small allocations of up to 10 dwellings in secondary villages
- in response to para 4.47 that Phase 2 SDLP sites should be released when there is not a demonstrable five year supply of housing land rather than through the Sire Allocations DPD

- the inclusion of this policy at a late stage in the preparation of the Core Strategy in response to June 2010 PPS changes is not justified because no evidence has been produced to demonstrate the need to release Greenfield land as a windfall in order to meet the housing target, and neither has this been consulted on as an option.
- the policy is not sound as it fails to deliver a close match between housing growth and job growth allowing a disproportionately high level of development within service villages when they are not as sustainable as higher order settlements, and
- development should be allowed adjacent to development limits as there is no substantial evidence to retain Development Limits which were established 20 years ago.

7.38 A number of responses refer specifically to individual parts of the policy.

Policy CP1A Part a)

7.39 One respondent considers Part a) of the Policy to be unnecessarily restrictive and inconsistent with part d) which better reflects the respondent's preference for an appropriate scale of development to be provided in Secondary Villages. The respondent considers the Policy to be unsound and proposes a revised wording of part a) which draws heavily on the current wording of Part d), with Part d) omitted.

7.40 This respondent also objects to the restriction on the type of housing development deemed appropriate in Secondary Villages (2nd bullet point in Part a). It is argued that such a restrictive policy does not reflect national policy in PPS1 and PPS3 which requires development to be of an appropriate size in relation to the settlement. It is further suggested that the policy contradicts Core Strategy objectives, which support concentrating new developments in the most sustainable locations and meeting local housing needs in order to support rural regeneration.

Policy CP1 Part b)

7.41 One respondent considers the policy is confusing with regard to the treatment of farmsteads, and objects to the potential loss of character and heritage through development of land surrounding farmsteads, which it is argued could be avoided by restricting development to sympathetic conversion of the existing buildings. It is pointed out that the conversion of farmstead buildings is already permitted and therefore the respondent considers this part of the policy is unnecessary and any further detail should be left to future development management policies.

7.42 Another respondent in supporting the policy in respect of the conversion of farm buildings suggests an amended wording for the third bullet point in Part b) of Policy CP1A in order to emphasise the positive contribution to form and character of settlements.

**8.0 Chapter 5: Creating Sustainable Communities
Including Policies CP2, CP2A, CP3, CP4, CP5, CP6, CP7 and CP8**

The Scale and Distribution of Housing

Policy CP2 and accompanying paragraphs 5.1 – 5.28

8.1 During the representation period a total of 75 comments and observations were received from organisations and individual stakeholders in relation to Policy CP2 and the accompanying text. Table 8.1 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 8.1 Policy CP2 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
38	12	25
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
7	44	24
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
29	10	5

Issues Raised

8.2 The main issues arising from comments on Policy CP2 and associated text are whether the Regional Spatial Strategy evidence base and the resultant housing requirement of 440dpa are soundly based, and whether the distribution of housing growth between settlements is the most appropriate. A number of representations repeat comments made about Green Belt and Strategic Countryside Gaps in Chapter 4 (Spatial Development Strategy) which have been considered previously, or regarding phasing and Selby District Local Plan allocations which are included in the summary of comments made about Policy CP3 (Managing Housing Land Supply).

8.3 In terms of the overall housing requirement while there are a number of representations in support of the proposed target figure the greater weight of opinion is that either a higher figure should be used or that more flexibility should be built-in to the policy, for example by establishing a minimum figure and not a ceiling, or by increasing the allowance for non contributions from existing commitments.

8.4 One representation suggests that only percentage figures should be included in the table, with more detailed monitoring of delivery undertaken within the Annual Monitoring Report.

8.5 Those objecting to the use of the Regional Spatial Strategy housing requirement, (Paragraph 5.4), do so primarily on the grounds that more up to

date evidence should be taken into account, which points to a higher requirement. Information from the latest ONS household projections and evidence on the amount of affordable housing required in the Strategic Housing Market Assessment on affordable housing need and general market housing demand are quoted in this respect.

- 8.6 Another representation, however, supports the Core Strategy approach in relation to RSS because this enables the Council to make progress on its Core Strategy in line with the Government's wishes, by relying on soundly based work at the regional level. It is suggested that the alternative would involve lengthy delays in re-addressing the wide-ranging issues involved in any review.
- 8.7 With regard to the proposed distribution of housing growth between settlements opinion is divided between those that support the general approach and those that favour more, or less growth, in individual settlements.
- 8.8 One group of respondents while supporting the general balanced approach to housing distribution (Paragraph 5.9), consider that the proportion of new housing allocated to Selby is too great and lacks a delivery plan. They consider that highway and flooding constraints may inhibit delivery and there is no evidence that employment growth will match the same rate of housing growth. Another respondent also challenges the ability of the strategic development site and future large allocations to deliver an adequate amount of housing.
- 8.9 Of those favouring a different distribution of housing a number consider that there is too much reliance on Designated Service Villages which have insufficient potential for growth. Sherburn in Elmet and Tadcaster are the two most frequently mentioned alternative locations. In comparison two respondents consider the scale of growth in secondary villages should be increased.
- 8.10 Reasons put forward for promoting more growth at Sherburn in Elmet are that it is the second most sustainable location (after Selby), with good infrastructure and local facilities, and access to job opportunities. The Strategic Housing Market Assessment and the Employment Land Register are cited as providing the necessary evidence to support the view that Sherburn is a suitable location for more housing and forecast to create many more jobs.
- 8.11 A number of responses also suggest increasing growth at Sherburn in Elmet at the expense of Tadcaster, which in comparison is considered to have poorer public transport (including no train service), and a poorer range of job opportunities, as well as suffering from deliverability issues. A complimentary objection also suggests that the scale of growth at Tadcaster is unsound because no evidence has been provided to demonstrate that there is a local need for 650 dwellings.
- 8.12 A small number of respondents argue in favour of increasing the role of the three villages closest to Selby (Barlby, Brayton and Thorpe Willoughby) on the grounds that they are the most sustainable villages and in view of potential constraints in Selby
- 8.13 Other comments and suggestions concerning the Policy and accompanying text are:

- the Core Strategy end date should be extended to 2031 to cover a twenty year period from adoption, consistent with a long term green belt boundary.
- the period covered by the Core Strategy should be reduced to 15 years, ie so it is written as it is intended to be adopted, rather than 16 years
- the context for the policy (para 5.4) should provide more information regarding the transition period following the likely revocation of RSS
- para 5.5 wrongly implies that Selby District Local Plan allocations are included in the commitments
- the selection of the strategic development site at Olympia Park is flawed (paras 5.12 and 5.13) because insufficient weight has been given to flood risk and highway constraints
- the policy does not adequately reflect the commitment given in para 5.15 to preventing coalescence between Selby and Brayton
- the Core Strategy should properly define the criteria for continued smaller scale growth in the larger, more sustainable villages (para 5.20).
- the text should be revised and reference made to a longer term 20 year Green Belt boundary (para 5.22). Green Belt revisions should be restricted to higher order settlements (Local Service Centres and Designated Service Villages) and only then when there is no safeguarded land available.
- the reference to Green Belt reviews should be strengthened to add flexibility to allow the Council to consider all reasonable alternatives.
- the Development Limits of Designated Service Villages (such as Fairburn) should be amended only if 'Brownfield' sites across all the identified DSVs do not meet the development quota allocated to DSV's.
- explicit reference should be made to the effect that there will be a need to amend Development Limits in order to accommodate extensions to the Selby urban area. (CP2(B))
- the words 'more limited' are unnecessary and should be omitted from part C of the policy, since development options for the two towns can be considered in the Allocations DPD.
- Part C should make explicit reference to potential localised amendments to Development Limits and Green Belt boundary, through a Site Allocations DPD, including the creation of Safeguarded Land if appropriate.
- The scope of Part D of the Policy should be widened to include allocations in both Secondary Villages and the Countryside, making reference to the need to amend development Limits where appropriate.

Olympia Park Strategic Development Site

Policy CP2A and associated Paragraphs 5.29 – 5.39

8.14

A total of 18 comments and observations were received from organisations and individual stakeholders in relation to Policy CP2A and the accompanying text. Table 8.2 below shows how the representations relate to the Legal

Compliance and Soundness of the document.

Table 8.2 Policy CP2A - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
0	0	18
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
2	12	4
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
5	6	1

Issues Raised

- 8.15 Strong support and commitment to the early development of the site is expressed by the joint owners.
- 8.16 The principle objections concern viability and deliverability issues particularly in relation to highways, flood risk and other infrastructure, and the ability of the site to deliver the intended scale of housing in the period up to 2026.
- 8.17 It is suggested by one respondent that the policy fails to set out a programme for housing delivery on the site over the plan period, and therefore cannot be effectively monitored. The respondent is particularly concerned that housing delivery in the early part of the period could be compromised by potentially lengthy lead-in times.
- 8.18 Other respondents are concerned about the impact of noise from the existing railway on residential properties, the inability of local services to support the development and increased out-commuting.
- 8.19 Comments and suggestions concerning specific parts of the policy are as follows:
Criterion iii – (production of a Master plan)
- 8.20 Consultation on the master plan should be undertaken prior to the submission of any planning application on the site, as doing so after submission would not accord with national policy.
Criterion v – (impact on the transport network)
- 8.21 The policy should clarify that the term 'highway network' also applies to the Strategic Road Network and that any improvement should be at the developers expense.
Criterion vi – (sequential approach to flood risk)
- 8.22 Reference to 'the Council's Level 2 SFRA' should be replaced by 'the Council's most up to date SFRA' as the former will soon become outdated. The respondent considers the Strategy should contain clear justification for deviating from PPS25 guidance that sites in higher flood risk areas should

only be allowed when there are no reasonable alternative sites in lower flood risk areas as this case potential Strategic Sites with lower flood risk were discounted for reasons such as 'Strategic Countryside Gap'.

Criterion viii – (infrastructure requirements)

8.23 Minor rewording required to recognise the link between the amount of affordable housing and viability at each phase of the development.

Criterion xi – (maximising opportunities for sustainable travel)

8.24 Explicit reference to a Travel Plan should be included in this criterion dealing with encouraging sustainable travel.

Criterion xii – (amenities of existing residents)

8.25 Development within the Selby Conservation Area on the riverside area at the south-western end of the site could impact on the views of Selby Abbey.

Criterion xiv – (incorporating sustainable construction and design)

8.26 Considered that this criterion is too inflexible and not founded on a reliable evidence base.

8.27 Other comments on the supporting text to the policy are:

- The introductory sentence to para 5.35 should establish a requirement for the scheme to contribute toward the setting of the conservation area rather than making an assumption that the scheme will contribute to the setting of the conservation area.
- Specific reference should be made in para 5.36 to the opportunity to enhance Green Infrastructure, and
- Whether the Delivery Framework Document referred to in para 5.39 adequately demonstrates the viability and deliverability of the site, particularly in terms of flood risk mitigation. This respondent questions whether the Delivery Framework Document has been independently assessed, and suggests that a number of alternative strategic sites should be identified to provide greater flexibility if unforeseen circumstances occur which threaten the deliverability of Olympia Park.

Managing Housing Land Supply

Policy CP3 and accompanying paragraphs 5.40 – 5.55

8.28 During the representation period a total of 20 comments and observations were received from organisations and individual stakeholders in relation to Policy CP3 and the accompanying text. Table 8.3 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 8.3 Policy CP3 - Legal Compliance and Soundness

Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
15	2	3
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
3	9	8
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
4	4	1

Issues Raised

- 8.29 One respondent objects to the interim approach to the release of the Selby District Local Plan Phase 2 sites proposed in paragraph 5.49 (which is also referred to in paragraph 5.41 - Phasing). The respondent considers that there should be no discrimination between the Phase 2 sites on the basis of whether they comply with the Core Strategy or not and that all Phase 2 sites should be regarded as unharmed and released now in accordance with the RSS guidance (Table 2.2) to make the best use of existing allocations.
- 8.30 Two representations generally support the approach set out in the first part of the policy (Part A) which deals with monitoring the achievement of the housing trajectory and the use of indicators to ‘trigger’ the release of land. One of these suggests that a flexible phasing plan be considered for the site allocations in order to guard against under supply, particularly in the current economic circumstances. Firstly objection was raised to the reference to the 'housing trajectory' in the first sentence of the policy. The respondents consider that the policy should clarify that the annual requirement will set the target not the modified trajectory.
- 8.31 Another respondent objects to the reference to the 'housing trajectory' in the first sentence of the policy – suggesting that the annual requirement should set the target not the modified trajectory.
- 8.32 Other respondents wish to see more clarity regarding the extent of the shortfall required to trigger the release of more housing land, and the inclusion of a reference to the role of the Annual Monitoring Report, particularly in the light of the Localism Bill.
- 8.33 A small number of representations focus on the second paragraph in Part B of the policy which deals with the release of land in the interim period following adoption of the Core Strategy and prior to the adoption of the Site Allocations DPD. The general tenor of these comments is that there should be greater flexibility within this period to consider bringing forward other suitable, sustainable sites which comply with the Core Strategy objectives. One of the representations indicates it is not clear what work has been carried out to ensure that the Phase 2 sites are the most sustainable option. Another would like to see the second paragraph deleted in its entirety.
- 8.34 A further representation suggests that the Five Year Supply should be

applied in accordance with the distribution as proposed in Policy CP2 (Part A) to ensure development comes forward broadly in accordance with the spatial strategy.

- 8.35 With regard to Part C of the policy (which deals with action to be taken in the event of a shortfall in the previously developed land target) one respondent is unclear how the Council will tackle any remedial action if a shortfall occurs, and another comments that the target should not be viewed as a goal in its own right but one measure in securing sustainable patterns of development.

Housing Mix

Policy CP4 and accompanying paragraphs 5.56 – 5.70

- 8.36 A total of 13 comments and observations were received from organisations and individual stakeholders in relation to Policy CP4 and the accompanying text. Table 8.4 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 8.4 Policy CP4 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
10	1	2
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
2	1	10
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
0	1	0

Issues Raised

- 8.37 The majority of comments received support this policy although one adds a caveat that the emphasis on more family housing could impact on density and the amount of land required.
- 8.38 Another representation objects to the reliance in the policy on the latest available Strategic Housing Market Assessment and suggests the policy should be sufficiently flexible to reflect changing circumstances during the plan period.
- 8.39 A small group of respondents point out that while there is reference to the Strategic Housing Market Assessment results in para 5.63, there is no reference to the figures including total market housing demand.
- 8.40 Others, while welcoming the reference in para 5.64 to more family housing being required in all parts of the District, consider that inadequate recognition is given to the need for smaller dwellings identified in the SHMA, particularly in the affordable housing category. Another group consider that the reference made to 'additional evidence from responses to the Draft Core Strategy.....' in para 6.67 should be properly referenced, and that more

account should be taken of the cost implications of designing homes for specific disability needs.

Affordable Housing

Policy CP5 and accompanying paragraphs 5.71 – 5.94

8.41 During the representation period a total of 39 comments and observations were received from organisations and individual stakeholders in relation to Policy CP5 and the accompanying text. Table 8.5 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 8.5 Policy CP5 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
30	3	6
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
1	22	16
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
11	9	2

Issues Raised

8.42 A number of responses comment on the approach to affordable housing generally although the majority of representations focus on Parts A and B of the policy in relation to the overall aspirational target for affordable housing, the proposed upper limit for negotiating purposes, and the proposed lower threshold for on site provision.

General Comments

8.43 General comments are evenly split between those that support the policy, particularly in relation to the matters identified in the last paragraph of the policy which are intended to be open for negotiation; those that consider the approach lacks flexibility; and those which advocate a different approach entirely.

8.44 Suggested alternative approaches include:

- setting a target for different geographical areas of the District,
- adopting the approach in York which involves a sliding scale. and
- undertaking regular reviews of the targets, through the SPD process in response to housing market changes.

8.45 A further response advocates giving consideration to a policy on self-build housing, which would provide a form of affordable housing between the commercial and housing association sectors.

Parts A and B

- 8.46 There are a number of comments relating to the aspirational target for overall affordable housing, particularly the upper limit target for negotiating a developer contribution. Some respondents question the evidence and assumptions made in the Economic Viability Assessment and therefore whether it appropriately represents a 'height of the market' figure. Others question whether it is an appropriate target, given current economic circumstances.
- 8.47 Two respondents object to the lower threshold of 10 dwellings suggesting that it is too low to be viable. They question the evidence for the threshold, and one suggests that the Council's main priority should be to ensure that rigid adherence to the contributions sought does not lead to schemes becoming unviable.

Part C

- 8.48 One respondent would like to see Part C of the policy deleted as they consider the requirement for a commuted sum from sites falling below the threshold is unsound and not justified.

Final Paragraph

- 8.49 One respondent suggests that the requirement for all applications to have a viability assessment is contrary to case law.

Accompanying Text

- 8.50 Three separate respondents comment on the accompanying text. Points raised are as follows:
- paragraph 5.73 should be expanded to express the affordable housing requirement as a proportion of the sum of affordable housing need and normal housing market demand as provided in the Strategic Housing Market Assessment.
 - setting a 40% District wide target will harm the delivery of housing in key sustainable locations which have a lower viability than many rural areas.
 - the overall housebuilding requirement for the District is too low to generate the amount of affordable housing required. (considered under Policy CP2 above).
 - the 40% upper limit target contradicts the evidence and does not represent a 'pragmatic approach' as claimed in paragraph 5.86
 - the 40/60 intermediate/social renting tenure split proposed in paragraph 5.93 will not produce mixed and balanced communities and a mix of 50/50 would be more appropriate in line with evidence in the Strategic Housing Market Assessment.
 - the last sentence of paragraph 5.94 should be changed to reflect the fact that reductions 'will' be negotiated rather than 'may' be negotiated, where it is demonstrated that the targets are not viable,
 - alternatively, negotiation should only take place in exceptional circumstances.

Rural Exception Sites

Policy CP6 and accompanying paragraphs 5.95 – 5.98

8.51 During the representation period a total of 9 comments and observations were received from organisations and individual stakeholders in relation to Policy CP6 and the accompanying text. Table 8.6 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 8.6 Policy CP6 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
4	2	3
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
1	3	5
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
2	1	0

Issues Raised

- 8.52 The representations concerning Policy CP6 are mostly of a general nature.
- 8.53 One respondent objects to the policy in principle arguing that in order to create sustainable communities new housing should not be restricted to affordable tenures only. It is suggested the Strategy should seek to identify allocations within smaller settlements capable of accommodating both market and affordable housing to ensure the balance of provision is maintained.
- 8.54 In a similar vein, a small group of representations do not consider the District is sufficiently rural as to warrant inclusion of such a policy. They consider the policy would apply to most settlements in the District and is therefore meaningless. They suggest that this matter is addressed through making small allocations in the Site Allocations DPD.
- 8.55 A further respondent considers there is very little incentive for landowners to release their land solely for affordable housing and therefore the Council should consider allowing a degree of open market housing on exception sites to provide an improved level of financial viability.
- 8.56 Although agreeing with the principle of exceptions sites, one respondent considers that there should be more justification as to why a population of 3,000 provide the threshold for the policy and, following a sound assessment, wishes to see the Strategy identify a definitive list of 'qualifying villages'.
- 8.57 Another respondent considers the policy is not legally compliant as it does not define what 'small scale rural housing' is.

The Travelling Community

Policy CP7 and accompanying paragraphs 5.99 – 5.109

- 8.58 During the representation period a total of 8 comments and observations were received from organisations and individual stakeholders in relation to Policy CP7 and the accompanying text. Table 8.7 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 8.7 Policy CP7 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
0	0	8
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
0	7	1
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
5	1	1

Issues Raised

- 8.59 Only a relatively small number of representations have been received on Policy CP7 which focus on the scale of identified need for gypsy and traveller sites, and on Criteria i), iv) and vi).
- 8.60 One respondent considers the identified need of 10 pitches quoted in paragraph 5.105 is inadequate, as the North Yorkshire Gypsy and Traveller Accommodation Assessment has identified a need for 33 pitches up to 2015, and the paragraph should state this:
Criteria i- (Avoiding Green Belt and sensitive locations)
- 8.61 Two representations suggest that the list of constraints is too detailed and does not reflect current guidance. Green Belt is mentioned by both as not being a primary constraint; one noting that there is a preference for travellers sites in the west of the District. The reference to Locally Important Landscape Areas is also questioned.
- 8.62 Another respondent considers that the list of constraints is too selective and a more generic term for the historic environment should be used.
Criteria iv – (Protecting local amenity and the character of the area)
- 8.63 With regard to Criterion iv) one respondent considers that it would open the door to NIMBY objections. It is suggested that any development can be held to have significant adverse impacts on amenity and, as with all planning issues there is a balance to be struck between utility and harm. A small amendment to the wording for the Criterion is proposed.

Criteria vi – (Avoiding land with higher flood risk)

8.64 There are two objections to Criterion vi). One considers that flood risk information is not sufficiently detailed in rural areas so a more general wording is required. The second objects to the sequential test which excludes caravans from Flood Zone 3. The objector notes there may be some circumstances where housing may be built in Flood Zone 3 and yet caravans can be towed away to safety.

Access to Services, Community Facilities and Infrastructure

Policy CP8 and accompanying paragraphs 5.110 – 5.126

8.65 During the representation period a total of 14 comments and observations were received from organisations and individual stakeholders in relation to Policy CP8 and the accompanying text. Table 8.8 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 8.8 Policy CP8 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
6	2	6
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
3	7	4
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
2	2	3

Issues Raised

8.66 Only a small number of comments have been received on this policy and associated text, namely:-

- the policy should make positive reference to the Community Infrastructure Levy.
- the evidence base for the policy does not make clear where there are strengths and weaknesses in the existing infrastructure.
- the word ‘must’ should be replaced by ‘should’ in the first paragraph as the former is considered too onerous and inflexible.
- the wording in the third paragraph relating to Green Infrastructure needs to be more aspirational unless demonstrated unfeasible.
- The Council should adopt the Community Infrastructure Levy as a volunteer pilot authority (Paragraph 5.121)

8.67 A small group of respondents also object to the list of potential types of infrastructure in paragraph 5.126 on the grounds that they do not appear in the CIL Regulations (November 2010)

8.68 A further response comments on the fact that it is not clear how Map 7 with regard to Green Infrastructure meaningfully relates to any of the policies.

**9.0 Section 6: Promoting Economic Prosperity
Including Policies CP9, CP10 and CP11**

**The Scale and Distribution of Employment Growth
Policy CP9 and accompanying paragraphs 6.1 – 6.31**

9.1 During the representation period a total of 30 comments and observations were received from organisations and individual stakeholders in relation to Policy CP9 and the accompanying text. Table 9.1 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 9.1 Policy CP9 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
7	1	22
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
5	13	12
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
5	3	5

Issues Raised

9.2 A number of representations support the general approach to employment growth outlined in both the policy and the accompanying text.

9.3 Two main policy issues are raised namely, the future role of Drax Power Station and the future of the former Selby Mine Sites.

9.4 One representation considers that the Core Strategy should make provision for energy/infrastructure development at Drax through site specific policies and land use allocations, in addition to generic policies. It is suggested that Drax should be recognised as an appropriate location for the development of energy infrastructure as well as related activities.

9.5 With regard to the former mine sites (clause ix), there is one specific supporting representation in favour of re-using the former mine sites for employment purposes and another objecting on the basis that the reference to potential activities on the former mine sites at Stillingfleet and Wistow is tantamount to making an allocation, which is inappropriate in a Core Strategy and contrary to national policy. A further representation considers the Wistow

site should not be developed but should be returned to agriculture.

- 9.6 Comments on specific paragraphs in the text are summarised below.
- 9.7 One respondent considers the first part of the fourth bullet point in paragraph 6.9 could be interpreted as undermining efforts to encourage investment at Drax Power Station, and suggests deleting the phrase 'There is a high dependency on manufacturing and the energy sector and
- 9.8 A representation on paragraph 6.13 and Figure 12 makes the point that it is not clear whether the requirements are in addition to existing allocations, bearing in mind that a number of these are constrained in the short to medium term.
- 9.9 A representation on paragraph 6.19 questions how sustainable further employment growth in Tadcaster can be accommodated without the existence of a rail connection.
- 9.10 One objection to paragraph 6.26 considers there is an implication that all forms of energy infrastructure will “assist in reinvigorating, expanding and modernising the District's economy.” The respondent considers this is not the case with wind turbines and that the paragraph should be clarified to focus on those forms of energy infrastructure that have demonstrated potential to assist the economy by deleting the end of the paragraph “...It is recognised that there is a need for further investment in energy infrastructure to develop the sector's role as a prominent contributor to the District's economic prosperity.”
- 9.11 Another representation on paragraph 6.26 would like Drax to be designated for energy related development that will facilitate the statement that “supporting the energy sector will assist in re-invigorating, expanding and modernising the District's economy.”
- 9.12 On paragraph 6.27 one respondent wishes to see energy usage and energy production dealt with separately. It is further suggested that the Core Strategy should also differentiate between ' industrial renewable energy generation' and small scale/domestic renewable energy generation.
- 9.13 Two further responses to paragraph 6.27 make the point that wind turbines do not create significant local employment opportunities and object to the implication within the paragraph that this is so. In addition one respondent also makes the point that the research of his organisation suggests that wind turbines is extremely unpopular and suggests that the words 'potentially controversial' in the first sentence be changed to 'unpopular'.
- 9.14 With regard to paragraphs 6.28 -6.29, one respondent suggests there should be a reference to the former North Selby mine site and its potential use as a Renewable Energy Centre. The respondent also considers reference should be made to Gascoigne Wood as an established employment location and objects to the text which states that Stillingfleet and Wistow sites are not considered suitable for large scale/intensive economic activities. The reference is considered unduly negative given the sites have rare and significant infrastructure that offers opportunities for development. An amended wording is suggested to accommodate these points.

Rural Diversification

Policy CP10 and accompanying paragraphs 6.32 – 6.37

9.15

A total of 3 comments and observations were received from organisations and individual stakeholders in relation to Policy CP10 and the accompanying text. Table 9.2 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 9.2 Policy CP10 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
1	1	1
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
1	1	1
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
0	1	0

Issues Raised

9.16

Three representations have been submitted on Policy CP10 (and none on the accompanying text).

9.17

One respondent generally supports the policy, and another supports the policy in principle but requests an additional bullet point supporting the re-use of infrastructure, including large electricity grid connections at the former mine sites and the rail sidings at the former Gascoigne Wood mine site.

9.18

The third representation suggests replacing the words 'not harm' in the second paragraph of the policy with the words 'maintain and enhance' to comply better with national guidelines. The respondent also considers that it would be appropriate to support the provision of suitable infrastructure such as broadband to encourage rural diversification, consistent with the emerging strategy of the York and the North Yorkshire Local Economic Partnership.

Town Centres and Local Services

Policy CP11 and accompanying paragraphs 6.38 – 6.64

9.19

A total of 12 comments and observations were received from organisations and individual stakeholders in relation to Policy CP11 and the accompanying text. Table 9.3 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 9.3 Policy CP11 - Legal Compliance and Soundness

Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
3	1	8
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
6	3	3
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
2	1	0

Issues Raised

- 9.20 A small number of representations generally support Policy CP11, although one of these would prefer to retain the wording of Part B(c) in the previous Consultation Draft version of the Strategy.
- 9.21 Three representations raise policy issues.
- 9.22 One considers that part A of the policy dealing with the spatial strategy is too vague and not properly defined, and should establish a precise method for its implementation
- 9.23 A second argues that in order for the spatial strategy for the health and well being of Tadcaster town centre and its enhancement to be effective the policy must support the respondent's approved comprehensive regeneration proposals for the town.
- 9.24 The third representation proposes the words 'through a Travel Plan' be added to the end of criterion f) in Part B of the Policy, to reflect the importance of travel planning.
- 9.25 Representations on the accompanying text to Policy CP11 are mostly positive, particularly regarding the recognition given to the contribution made by Selby's heritage and Tadcaster's heritage towards the vitality and attractiveness of each town and the reference to improving Sherburn's infrastructure and facilities to support further growth.
- 9.26 One respondent suggests that the final sentence of paragraph 6.56, would be clearer if it referred to 'reducing' the vacancy rate (rather than improving the vacancy rate), as the current wording makes the justification run counter to national policy.

**10.0 Section 7: Improving the Quality of Life
Including Policies CP12, CP13, CP14, CP15 and CP16**

General

- 10.1 Two respondents comment generally on the whole of Chapter 7.
- 10.2 One respondent considers that the whole chapter is unsound as it based on unsound national policies which rely on an unproven link between CO² emissions and climate change. The respondent also considers that reliance on PPS22 guidance regarding noise from wind energy development is also unsound because it does not recognise the potential health risks from infra-sound and is based on out of date research. The respondent considers the Strategy should remove all references to CO² and fossil fuels being responsible for climate change, and more up to date guidance should be incorporated relating to the issue of windfarm noise.
- 10.3 The second respondent considers there is a fundamental error in the Core Strategy as there is no focus within it upon delivering sustainable patterns of development which is the statutory function of the planning system. The respondent suggests that adaptation and mitigation responses to climate change should be separated in accordance with PPS1, and the guidance in the Supplementary to PPS1 should be incorporated in the Strategy.

Sustainable Development and Climate Change

Policy CP12 and accompanying paragraphs 7.4 – 7.34

- 10.4 During the representation period a total of 21 comments and observations were received from organisations and individual stakeholders in relation to Policy CP12 and the accompanying text. Table 10.1 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 10.1 Policy CP12 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
6	1	14
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
3	5	13
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
2	2	1

Issues Raised

10.5 A small number of representations support this policy in principle, (with reservations on specific criteria in one or two cases). A small number of general issues have also been raised as well as a number of representations on specific parts of the policy.

General comments

10.6 One respondent would like reference to the re-use of former Selby Mine sites to be incorporated in the policy, which the respondent considers are a significant asset in attracting renewable/low carbon energy developers to the District.

10.7 Another wishes to see the scope of the policy extended to specifically require the incorporation of Sustainable Drainage Schemes (SuDS) in schemes unless it can be demonstrated that they are unfeasible or create an unacceptable pollution risk. The respondent suggests a target be set of a 30% reduction in surface water run-off to mitigate against the effects of climate change.

Part A

10.8 One representation strongly supports the preference given to the re-use, best use and adaptation of existing buildings and the use of previously developed land in criterion (b), while another considers it is unclear as to what is meant by the paragraph and considers it needs further explanation. A second representation supported the representation but considered that the phrase “without compromising the quality of the local environment “ should be more precisely defined.

10.9 Three representations concern criterion (d) – avoiding development in high flood risk areas. Two of these make the point that it is unclear how the Council have justified the allocation of the strategic development site (Olympia Park) and the scale of growth in Selby in the context of the policy. One of these also suggests that where development is unavoidably located in areas of higher flood risk it must not increase flood risk ‘on-site’ (as well as ‘elsewhere’ as currently referred to). The third representation supports the criterion but suggests that the text could provide links to the Strategic Flood Risk Assessment and the sequential test.

Part B

10.10 With regard to Part B of the policy one respondent comments to the effect that the phrase “heat island effect” in Criterion (b) needs further explanation and that Criterion (h) unnecessarily overlaps with Policy CP13.

Accompanying Text

10.11 A number of individual responses support specific elements of the accompanying text to the policy. (paras 7.14, 7.17, 7.24-7.26 and 7.29 in particular). Concerns and issues raised by other respondents are as follows;

- Paragraph 7.28 should set out how the Olympia Park strategic development site can deliver housing and employment growth in a way which mitigates and minimises flooding, as it is not accepted that the Level 2 Strategic Flood Assessment demonstrates that flooding will not be increased elsewhere.
- More detail should be provided in paragraph 7.30 as to how it is

intended to achieve the objective of minimising the need to travel and Background Paper No.5 should downgrade the weight given to employment opportunities outside the District. (This objection is made with specific reference to the classification of Fairburn as a Designated Service Village)

- The objective of reducing the need to travel referred to in para 7.30 will not be achieved through the proposed distributional strategy unless more weight is given to supporting growth in more sustainable villages surrounding Selby.

Improving Resource Efficiency

Policy CP13 and accompanying paragraphs 7.35 – 7.56

10.12

During the representation period a total of 18 comments and observations were received from organisations and individual stakeholders in relation to Policy CP13 and the accompanying text. Table 10.2 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 10.2 Policy CP13 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
7	0	11
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
4	7	7
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
5	1	1

Issues Raised

10.13

Three representations express general support for Policy CP13 although one of these comments that as Selby moves toward establishing more local targets, Part (a) of the policy which establishes minimum thresholds and targets for securing energy from renewable sources in association with new development could be strengthened. It is suggested that qualifying residential developments should be required to provide a minimum of 10% of total predicted energy requirements through either a renewable source or through energy savings, which would encourage the design of more energy efficient developments from the outset.

10.14

Another representation suggests that rather than requiring 10% production from renewable or low carbon sources, it would be more beneficial to require a 10% decrease in carbon emissions. The respondent gives examples of measures which could be used and considers size thresholds should be determined as an iterative process based on the latest targets.

- 10.15 Other comments on this part of the policy include the need for more flexibility and a suggestion to incorporate reference to renewable energy/low carbon sources being “feasible and viable” to ensure that energy requirements are determined on a site by site basis.
- 10.16 Part b) of the policy directs strategic sites to derive the majority of their total predicted energy requirements from renewable, low carbon or decentralised sources. One representation considers it is unclear whether it relates to the 10% figure identified in Clause a), or whether it relates to the majority of the total energy supply on such sites. It is further suggested that Part b) is reworded to take into account new and emerging technologies and to bring it in line with national guidance which indicates that policies should avoid being prescriptive on technologies and be flexible as to how carbon savings are secured. A second respondent considers the wording is too inflexible as the need to derive the majority of energy from renewable, low carbon or decentralised sources may affect the viability of the scheme. The respondent requests that the word 'majority' is replaced to reflect concerns. The respondent also considers that this Clause is not founded on reliable evidence base.
- 10.17 Three respondents object to the implication in Part c) of the policy that developers should employ the highest viable level of the Code for Sustainable Homes and BREEAM standards.
- Accompanying Text*
- 10.18 A number of representations have also been made on the text accompanying Policies CP13 and CP14. (namely paragraphs 7.38, 7.39 which is a supporting representation, 7.40, 7.41, 7.43 and 7.56) as follows:
- Paragraph 7.38 should distinguish between wind turbine schemes which are operational and those which are not, and ‘actual ‘ generation should be compared to stated capacity, where figures are available.
 - the total energy production from co-firing biomass at both Eggborough and Drax Power Stations should be provided in para 7.40 in order to provide a fuller local context.
 - in paragraph 7.41 as the total amount of CO² produced from the District's power stations is known, the potential reduction should be expressed in tonnes in order to provide complete information.
 - the last sentence of paragraph 7.43 should be reworded by omitting the phrase “the impacts of climate” and replacing it with “their contribution to the causes of climate change.” as the Core Strategy addresses “Tackling Climate Change” rather than dealing with the impacts.

Low Carbon and Renewable Energy

Policy CP14 and accompanying paragraphs 7.35 – 7.56

- 10.19 A total of 5 comments and observations were received from organisations and individual stakeholders in relation to Policy CP14 and the accompanying text. Table 10.3 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 10.3 CP14 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
0	0	5
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
3	1	1
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
0	1	0

Issues Raised

10.20

Three of five representations support this policy.

Of the two negative responses one requests that the policy should include reference (through an additional bullet point) to the National Grid connections at the former mine sites, whilst a second considers that windfarm development should not be allowed in the District to the detriment of settlements and areas of nature conservation such as Bishops Wood.

Protecting and Enhancing the Environment

Policy CP15 and accompanying paragraphs 7.57 – 7.70

10.21

A total of 9 comments and observations were received from organisations and individual stakeholders in relation to Policy CP15 and the accompanying text. Table 10.4 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 10.4 Policy CP15 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
1	2	6
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
0	7	2
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
6	0	1

Issues Raised

- 10.22 Three general comments have been made with regard to Policy CP15.
- 10.23 One considers it would be appropriate to refer to the cultural environment as well as the historic assets whilst a second suggests that nature conservation interests need to be balanced against social and economic needs, including the need for renewable energy generation.
- 10.24 A third representation while supporting the approach to habitat restoration and green infrastructure provision notes that the protection and enhancement of landscape character has not been included which is an integral part of enhancing the natural environment, and also suggests that reference to geological interest should be made in point 3b of the policy (protection and management of biological features). This respondent also considers that insufficient recognition is given to the importance of the Derwent Valley as an international area of ecological, cultural and landscape value and the need for Local Authorities to work towards a common approach.
- 10.25 With regard to individual sections of the policy one respondent considers that Point 1 of the policy adds nothing to what is subsequently covered by Points 2 and 3, and could be omitted.
- 10.26 Objection is raised to Point 2 (protecting and enhancing historic assets) on the grounds that there is no indication either within the policy or its justification as to how it is intended to use the protection and enhancement of the historic environment to contribute to economic regeneration, tourism, education and local distinctiveness, in order to comply with the guidance in PPS5. The respondent considers the policy to be too generic and does not add substantially to national guidance. With the imminent loss of the Regional Spatial Strategy it is suggested there is a clear need for the Core Strategy to cover these aspects of the management of the historic environment.
- 10.27 The same respondent also considers there is a need for an overarching policy for the conservation of the historic environment of Selby with specific reference to its locally distinctive buildings, areas and assets. It is suggested that the Core Strategy should provide a context for more detailed historic environment policies in other Development Plan Documents, Area Action Plans and Supplementary Planning Documents.

Associated Text

- 10.28 There are four representations on the accompanying text.
- 10.29 One respondent suggests that the final sentence of paragraph 7.57 does not follow logically from the previous ones and proposes some amended wording since a large number of the District's assets are unlikely to make any contribution to the Green Infrastructure of Selby.
- 10.30 Another respondent suggests that more detail should be provided in the Introduction and Context sections to support retaining the existing landscape and increase biodiversity - a number of measures are suggested to protect the character of the landscape and improve both its biodiversity and access to it.
- 10.31 In commenting on Map 8 – Green Assets the third respondent suggests it

would be more accurate to describe the map as Environmental and Cultural Assets, and that

- reference to Green Belts should be removed as this is merely a planning tool and not an asset.
- Locally Important Landscape Areas have no statutory designation and are not supported by the current evidence base and are therefore superfluous.
- Nature Conservation sites should distinguish between international designations and national/regional ones, and
- Conservation Areas and Historic Parks and Gardens, should be identified.

10.32 The fourth respondent considers the section on Local Issues confusing as it “flits from one topic to the other without identifying what the key issues for each are”. It is suggested that it would be more logical to deal with each element of the Policy in turn, setting out for each, what is significant about that particular asset in so far as Selby District is concerned, what the main issues are and what the Plan intends to do about it.

Design Quality

Policy CP16 and accompanying paragraphs 7.71 – 7.84

10.33 A total of 4 comments and observations were received from organisations and individual stakeholders in relation to Policy CP16 and the accompanying text. Table 10.5 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 10.5 Policy CP16 - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
1	1	2
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
1	1	2
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
1	0	0

Issues Raised

10.34 Four comments have been received regarding Policy CP16, one of which is an expression of support, with no comments directly concerning the accompanying text.

10.35 Of the negative comments received one respondent, while supporting the principle of an overarching Design Quality Policy, considers that numerous parts of the policy are duplicated elsewhere and could be deleted.

- 10.36 Another considers the words 'where possible' should be inserted in relation to the off-site landscaping required for large sites in Criterion d) and that Criterion i) is a duplication and should be removed.
- 10.37 Two representations object to the last part of the policy regarding building standards.
- 10.38 One considers that these requirements go beyond current standards and cannot be justified in this instance.
- 10.39 The other considers that the reference to 'Lifetime Neighbourhood' principles is not clearly referenced and therefore the exact impact of the policy is not clear. The same respondent considers that a strict obligation to 'Building for Life' standard will threaten the delivery of housing requirements, and suggests this should be an objective rather than a minimum standard. The respondent also considers that the reference to 'Lifetime Home Standards' appears to be premature and inconsistent with national policy and considers that the need for financial appraisals if not meeting these standards will slow down the process and increase the costs of making planning applications.

11.0 Section 8: Implementation

11.1 During the representation period a total of 11 comments and observations were received from organisations and individual stakeholders in relation to the Implementation section of the Core Strategy including Figure 13. Table 11 below shows how the representations relate to the Legal Compliance and Soundness of the document.

Table 11 Implementation - Legal Compliance and Soundness		
Do you consider the Core Strategy is legally compliant?		
Yes	No	Not Specified
3	1	7
Do you consider the Core Strategy is sound?		
Sound	Unsound	Not Specified
0	1	10
Do you consider the Core Strategy is unsound because it is not:		
Justified	Effective	Consistent with National Policy
1	0	0

Issues Raised

- 11.2 There is one general comment on this section together with a number of comments on individual monitoring indicators, which are listed below under the appropriate policy heading.
- 11.3 The general representation suggests that the monitoring indicators should be re-visited in order to better reflect the shift towards monitoring activity which informs the community of progress rather than meeting national targets.

Policy CP1/CP1A

- 11.4 One representation objects to using planning permissions as an indicator and wishes to rely solely on completions as a measure. A second response notes an inconsistency between the previously developed land target used as an indicator and the revised lower target within the Core Strategy itself.

Policy CP2/CP2A

- 11.5 One objector refers to the lack of any trigger point in Policies CP2/CP2A which might lead to remedial action if the housing target is not being met. (consequential to the above).
- 11.6 A second objector suggests that the modal split of those accessing the Olympia Park site should be used as an indicator, using targets to be agreed in a Travel Plan.

Policy CP3

- 11.7 One objector proposes that the intended outcome for Policy CP3 should be changed to read "Overall housing delivery targeted in the housing trajectory."

Policy CP5

- 11.8 In accordance with objections raised previously to the policy one respondent also objects to the targets for the proportion of affordable housing and the tenure split used for these indicators.

Policy CP8

- 11.9 One objector proposes a new indicator for policy CP8 – the number of Travel Plans secured through the planning process. The respondent considers this would help monitor the intended outcome of the policy in ensuring appropriate infrastructure and services are provided to meet the needs of new development.

Policy CP12

- 11.10 One respondent suggests a new indicator to measure the percentage of development incorporating Sustainable Drainage Schemes. It is also suggested that the existing wording of the last indicator be amended to include the words 'flood risk' before 'objection' at the end.

Policy CP13

- 11.11 There is one objection to the performance indicator as a result of an objection to the requirements of the policy itself.

Policy CP15

- 11.12 One representation to the monitoring proposals for Policy CP15 considers it would be preferable in monitoring the effectiveness of the Strategy if there were two targets - one measuring the number of heritage assets and the other measuring Heritage at Risk. Amended wording for the targets for Policy CP15 is suggested.

- 11.13 A second representation suggests a new target - "The percentage of Landscape Character Areas where marked changes or significant changes are inconsistent with character have occurred."

Policy CP16

- 11.14 One objection is linked to an objection to the requirements of the policy itself.

