Selby District Submission Draft Core Strategy

Soundness Self Assessment Statement





May 2011

Key question	Evidence provided
Justified	
Participation	
<ol> <li>Has the consultation process allowed for effective engagement of all interested parties?</li> </ol>	Consultation and community engagement were carried out in accordance with the SCI, which was adopted on 7 <sup>th</sup> December 2007. Details of consultations undertaken which included Issues and Options, Further Options and Draft Core Strategy (Preferred Options) are provided in paras 1.6 to 1.21 of the Selby District Submission Draft Core Strategy (Publication Version) SDSDCS(PV) and the Pre Submission Consultation Statement.
	In addition separate consultations on housing delivery issues were undertaken on two occasions in connection with the proposed introduction of Interim Housing policies. Firstly in February 2008 and again in September/October 2010. In neither case were the Interim Policies proceeded with but the consultation responses received have been taken into account within the Core Strategy preparation process. (See Paras. 1.8 to 1.10 and 1.18 to 1.20 of the SDSDCS Publication version)
Research/ fact finding	
<ul><li>2. Is the content of the development plan document justified by the evidence?</li><li>3. What is the source of the evidence?</li></ul>	A brief summary of the policy content of the Strategy and its evidence base is given below: Key issues addressed in the Core Strategy, together with references to the evidence base are set out in Paragraphs 2.38 to 2.46.
evidence? 4. How up to date and convincing is	Spatial Development Strategy Policy CP1
it?	The Spatial Development Strategy relies on principles established in the Regional Spatial Strategy which identifies Selby as a Principal Town. These principles are carried through into the Core Strategy (see Paragraph 4.3.) In interpreting the RSS spatial development principles the Core Strategy also has regard to the existing settlement pattern and hierarchy. The two smaller towns within the District of Sherburn in Elmet and Tadcaster are identified as local service centres having been previously identified in the Regional Settlement Study undertaken by the Yorkshire and Humber Regional Assembly in. Para 4.4 of the Core Strategy refers.(see List of Documents and Evidence referred to in the Core Strategy ).
	Designated Service Villages have been selected following assessment of key sustainability criteria (as described in Background Paper No.5) and the capacity to accept further limited growth (Background Paper No.6). Wherever possible, the selection also took account of community views expressed during consultation.
	Other locational principles set out in Paragraphs 4.30 – 4.41 are founded on national planning policy, and the

Key question	Evidence provided
	Spatial Development Strategy (Policy CP1) also reflects the strategic principles inherited from the Regional Spatial Strategy in the context of the local settlement hierarchy.
	The approach to flood risk within the policy is in accordance with Planning Policy Statement 25 – Development and Flood Risk and is underpinned by evidence in the Selby District Strategic Flood Risk Assessment Level 1 and 2 and associated studies.
	Evidence for the Previously Developed Land target is contained within Background Paper 4 and the January 2011 Addendum which takes into account the change in the definition of PDL outlined in PPPS 3 June 2010.
	How Up to Date and Convincing
	The settlement hierarchy comprising the Principal Town of Selby and the two smaller towns of Sherburn and Tadcaster and the numerous villages and hamlets is based on a combination of evidence at regional and local level.
	Background Papers 5 and 6, referred to above, have been updated through separate addenda in January 2011. The evidence identifies a number of villages which are capable of continued growth based on a combination of sustainability and physical criteria. In a small number of cases where the issues are less clear cut and the justification for inclusion/exclusion within the 'Designated Service Village' category is more marginal. In these cases, for example concerning Appleton Roebuck, local views when backed by reasoned justification have been taken into account.
	Evidence with regard to flood risk is up to date and sound. Since publication of both the Level 1 and Level 2 Strategic Flood Risk Assessments (in November 2008 and February 2010 respectively) the Environment Agency has issued more up to date flood risk maps for the River Ouse catchment. Further work has therefore been undertaken to update the Level 2 assessment which (published as an Addendum in January 2011).
	The evidence on past rates of previously developed land take up is up to date and sound. Reference is made in background Paper No. 4 to the difficulty of predicting the future availability of PDL within the District given that the urban areas are relatively small and do not contain sufficient opportunities to produce a steady stream of PDL sites. Past rates have fluctuated considerably depending upon the availability of limited larger opportunities.
	Management of Unplanned Residential Development within Settlements. Policy CP1A
	This policy is primarily a development management policy and is included in the Core Strategy because of the historic high number of proposals affecting village settlements which cumulatively generate a high number of permissions. This is an issue frequently referred to in consultation responses because of the impact on the form and character of settlements. As a Development Management DPD is not programmed to be completed until

Key question	Evidence provided
	June 2013 the Council have taken the view that policy guidance is necessary in the Core Strategy to ensure that the overriding objective of steering growth to the most sustainable locations is not compromised through significant unplanned development in smaller settlements. It also fulfills an important function in updating the Council's existing policy in the light of national policy changes.
	How Up to Date and Convincing
	The decision to include this policy was triggered by the publication of the revised PPS3 in June 2010 at a late stage in the Core Strategy process.
	Consultation was undertaken on the policy in September /October 2010 with a view to adopting an Interim Policy in advance of the Core Strategy. In the event this idea was not proceeded with although the response to consultation which was broadly supportive across the spectrum of interests, has enabled the policy to be refined prior to inclusion in the Publication version of the Core Strategy.
	Scale and Distribution of Housing Policy CP2
	The scale of housing development up to 2026 reflects that proposed within the approved (2008) Regional Spatial Strategy. (See Qu.'s 5 & 6 below.)
	The distribution of future planned development aims to reflect the strategy principles as initially set out in the Regional Spatial Strategy. After considering the evidence provided, particularly the Selby District Level 1 and Level 2 Strategic Flood Risk Assessment, evidence on highway capacity (See Traffic Impact Studies undertaken on behalf of SDC and NYCC by Jacobs Consultancy and Swingbridge Junction Assessment by AECOM, 2010) and the Landscape Assessment (see Background Paper 10 – Landscape Appraisals, January 2010), the total amount of new development directed to Selby town is considered to be an appropriate target. However, the surrounding villages of Barlby, Osgodby, Brayton and Thorpe Willoughby are very closely linked to Selby and have capacity to supplement growth in Selby itself and reinforce the strategy's focus on the town.
	The scale of development in Tadcaster and Sherburn is broadly proportionate to the proportion of the District's local needs as measured by the affordable housing need. (See Selby District Strategic Housing Market Assessment 2009), However adjustments have been made to take account of local circumstances in the two towns. See Paragraphs 5.16 and 5.17 of the Core Strategy.
	The proportion of development proposed for the Designated Service Villages is less than their corresponding proportion of affordable housing need, as this would not be compatible with the broader sustainability objectives of the Strategy. The Strategy therefore recognises that a significant element of affordable housing need will be met in Selby.

Key question	Evidence provided
	How Up to Date and Convincing
	In terms of the planned scale of development, the Regional Spatial Strategy remains a material consideration for the time being and Background Paper 9 (Local Housing Target) explains why the Council considers that the scale of housing growth identified in RSS remains an appropriate target.
	In terms of the spatial distribution of development, the housing distribution set out in the SDSDCS has regard to the Regional Spatial Strategy framework and also reflects local circumstances within the settlements of District.
	The response to consultation on the draft Core Strategy suggests that there is a majority view in favour of the general thrust of the policy, aimed at concentrating growth in the Selby area. However, a range of views has been expressed regarding the appropriate scale of growth in other settlements. The Core Strategy aims to strike a balance between too little development within villages, which does not help their local sustainability and concerns about over development, to the detriment of the environment of these smaller settlements and broader sustainability objectives. A variety of views have also been expressed with regard to the level of development appropriate in Sherburn and Tadcaster.
	Olympia Park Strategic Development Site Policy CP2A
	A strategic growth site is promoted in Selby in order to accommodate the scale of development required, and to deliver the benefits of a comprehensive approach to development. The site was selected from six alternatives (See Qu 7 and 8). Evidence on the viability and delivery of the site is provided in Background Paper No.7 and in a Delivery Framework Document, prepared jointly by the landowners. The scheme also has a concept plan prepared in consultation with the local community and key stakeholders.
	How Up to Date and Convincing
	The evidence base for the policy is up to date and has evolved through on-going liaison with the landowners/developers and key infrastructure providers and the process has been supported by ATLAS (The Advisory Team for Large Applications, sponsored by CLG/HCA). This includes technical studies on flood risk and highway impact assessments. The District Valuer has also provided independent advice on viability. The Council is currently establishing a 'planning performance agreement' to manage the planning application process.
	Managing Housing Land Supply
	This is a procedural policy which interprets the requirements of PPS3 for the Strategy and is not directly evidenced based.

Key question	Evidence provided
	Housing Mix - Policy CP4
	Evidence for this policy is provided by the Council's Strategic Housing Market Assessment 2009.
	How Up to Date and Convincing
	The SHMA is a recent and soundly based document .
	Affordable Housing Policy CP5
	The evidence on which this policy is based comes from:
	1. The Strategic Housing Market Assessment (SHMA) 2009
	2. The Affordable Housing Selby District Economic Viability Study 2009, and
	<ol> <li>Supplementary Small Site Threshold Testing Report</li> <li>2010</li> </ol>
	Both the Viability Study and the Small Site Threshold Testing Report were produced for the Council by DTZ
	How Up to Date and Convincing
	Both studies are recent and soundly based documents. Stakeholder groups were fully involved in the production of the SHMA and the Viability Study.
	Rural Housing Exceptions Sites Policy CP6
	This is a procedural policy which interprets the requirements of PPS3 for the Strategy and is not directly evidenced based.
	The Travelling Community – Policy CP7
	Evidence for this policy is provided by:
	Gypsy and Traveller Accommodation Assessment (GTAA) for North Yorkshire 2008

Key question	Evidence provided
	North Yorkshire Accommodation Requirements for Showmen December 2009.
	Both reports were produced by Arc 4
	While the GTAA identifies a requirement for 9 pitches in the period up to 2015 in Selby District, this figure reduces to 7 pitches when excluding the element of 'desired accommodation' from identified need. (The 10 pitch requirement identified in the Core Strategy is intended to cater for an element of future growth). In receiving the 'Showmens' report the Council concluded that there is no local or historic demonstrated need for a permanent site for showmen. (see Background Paper No. 13 The Travelling Community for more information).
	How Up to Date and Convincing
	These studies and conclusions provide the latest and most robust evidence available.
	Access to Services, Community Facilities and Infrastructure – Policy CP8
	This is primarily an enabling policy for improving infrastructure and does not rely specifically on the evidence base. Evidence on existing infrastructure and future needs is available through the NYCC Local Transport Plan, Selby District Recreational Open Space Strategy and Leeds City Region Green Infrastructure Strategy. The infrastructure needs of the District are included in addressed in an Infrastructure Delivery Plan, which is published as a separate document.
	Scale and Distribution of Economic Growth - Policy CP9
	The evidence base for this topic area is provided by:
	Selby District Employment Land Study 2007 produced for the Council by GVA Grimley
	Selby District Employment Land Refresh December 2010.
	Regional Econometric Model maintained by Yorkshire Forward.
	Retail, Commercial and Leisure Study (2009)
	Background Paper 12 – Promoting Economic Prosperity
	How Up to Date and Convincing
	The evidence base is considered to be up to date and sound.
	The Council's Employment Land Study was refreshed in 2010 and the Regional Econometric Model is maintained continuously by Yorkshire Forward.

Key question	Evidence provided
	Background Paper 12 Promoting Economic Prosperity was published in January 2011.
	Rural Diversification – Policy CP10
	This is a procedural policy which interprets the requirements of PPS4 for the Strategy and is not directly evidenced based.
	Town Centres and Local Services - Policy CP11
	The evidence for this policy primarily comes from :
	<ol> <li>Selby Retail, Commercial and Leisure Study 2009 produced for the Council by Drivers Jonas.</li> </ol>
	2. Employment Land Refresh 2010
	<ol> <li>Background Paper 12 - Promoting Economic Prosperity.</li> </ol>
	How Up to Date and Convincing
	The retail Study is considered to be up to date and sound.
	Sustainable Development and Climate Change – Policy CP12
	Background Paper 8, - Climate Change and Sustainable Development provided the principle reference point deriving evidence from both national and regional sources
	Selby Strategic Flood Risk Assessment (Level 1 and 2) and the accompanying sequential test are also relevant
	How Up to Date and Convincing
	It is considered the evidence is up to date and sound. However, other than for flood risk, there is only limited evidence available at District level which inhibits setting more locally specific targets at this stage.
	Improving Resource Efficiency and Renewable Energy Policies CP13 and 14
	Evidence for the national context is contained in:
	PPS22 (Renewable Energy)

Key question	Evidence provided
	Companion Guide to PPS1 (Delivering Sustainable Development)
	UK Renewable Energy Strategy 2009
	UK Low Carbon Transition Plan 2009
	Sub Regional Studies are considered in Background Paper 8 Climate Change and Sustainable Development
	How Up to Date and Convincing
	It is considered the evidence is up to date and sound. However, there is a lack of evidence specifically at the District level which prevents the policies being very specific to the District.
	Protecting and Enhancing the Environment
	Studies and schedules which provide the evidence base for this topic are:
	Selby Biodiversity Action Plan 2004
	'A Living Landscape' – Yorkshire Wildlife Trust
	Leeds City Region Green Infrastructure Plan
	Health, place and nature - How outdoor environments influence health and well-being; a knowledge base Sustainable Development Commission 2008
	Schedules of :
	Special Areas for Conservation under the UK Natura 2000
	Sites of Special Scientific Interest
	Historic Landscapes, Parks and Gardens and Historic Battlefields
	Sites of Importance for Nature Conservation (North Yorkshire County Council
	Conservation Areas and Conservation Character Assessments (1995 -2003)
	Heritage at Risk register
	How Up to Date and Convincing
	The evidence is considered to be up to date and sound. Although the policy is relatively general, the evidence does demonstrate the character of the District and allows the policy to emphasise those aspects most relevant to this rural District.

Key question	Evidence provided
	Design Quality Policy CP16
	Evidence for the objectives of Design policy is included in:
	Selby Sustainable Community Strategy,
	Selby Climate Change Strategy
	Selby District Community Safety Partnership Plan 2008 -2011.
	Secured by Design
	Building for Life Standards
	Code for Sustainable Homes and BREEAM standards
	Lifetime Homes standards
	Village Design Statements
	How Up to Date and Convincing
	The evidence is considered to be up to date and sound . Although the policy is relatively general, the evidence does demonstrate the high quality environment and character of the District (reflected in the District Portrait) which allows the policy to emphasise those aspects most relevant to this rural District.
5. What assumptions had to be	Assumptions
made in preparing the development plan document?	The following broad assumptions are considered fundamental to the Core Strategy. They do not include more detailed conclusions drawn directly from evidence on individual policies which are dealt with in the previous
6. Are the assumptions reasonal	
and justified?	RSS
	Throughout the preparation of the Core Strategy until the change of Government in May 2010, the assumption had been made that the Regional Spatial Strategy would be adopted and remain in force for 15 years or more. This was considered to be a reasonable assumption until the new Government indicated that the Regional Spatial Strategy will have a limited life as a statutory development plan document.
	The Council's reaction to the proposed cancellation of RSS is set out at the beginning of the Core Strategy document in an explanatory statement. The statement refers to the fact that the Core Strategy is compliant with RSS, but not withstanding whether RSS remains in force or not, the RSS evidence which has informed the preparation of the Core strategy, remains relevant having been tested through consultation and at Examination.

Key question	Evidence provided
	Affordable Housing
	Scale and Distribution
	An assumption has been made that the provision of affordable housing in association with private housing development will be constrained by the scale and distributional strategies adopted for the latter. Potential alternatives are discussed below, but it has to be assumed that, unless there is an increase in dedicated funding for affordable housing the amount and distribution of affordable housing will be primarily governed by the scale and distribution of affordable housing will be primarily governed by the scale and distribution of private housing.
	The implications of this assumption are that affordable housing will not be provided on the scale of need indicated in the Strategic Housing Market Assessment and will not necessarily be provided in the settlements where it arises, but will be focused more on Selby rather than in the villages.
	Is this reasonable and justified?
	The overall scale and distribution of new housing development proposed are considered to be the most appropriate to meet the the main planning aims and objectives of national planning guidance, the Regional Spatial Strategy which have strong sustainability and environmental themes. The Core Strategy has also taken into account the varying capacities of the District's settlements. (See Background Papers 5,6 and 9 and the Spatial Development Strategy Paragraphs $4.15 - 4.29$ ) and concluded that the distribution of housing development as now proposed is the optimum.
	The Council considers that without higher levels of dedicated funding for affordable housing, there is no alternative but to accept the constraints to affordable housing provision created by the reliance on market housing provision.
	Climate Change
	The Core Strategy assumes that the evidence that suggests that significant climate change is occurring, primarily as a result of $CO_2$ emissions is accurate.
	Is this reasonable and justified?
	This assumption is based on national guidance and evidence, and there is a requirement to produce DPD documents in accordance with national policy. In any case the policies being promoted to achieve sustainable development and greater energy efficiency remain appropriate to protect natural resources in the face of ever increasing pressures, to help overcome 'fuel poverty' and to reduce reliance on the national grid. Current weak economic conditions also focus attention on realising the potential for financial savings through greater energy efficiency.

Key	question	Evidence provided
		Minimising the Need to Travel
		The Core Strategy objective (8) of minimising the need to travel is based on the same assumptions made with regard to climate change and also reflects the resource inefficiency of petrol and oil driven fuelled engines. The assumption is made that this will continue to be a significant issue over the life of the Strategy.
		Is this reasonable and justified?
		This is considered to be a reasonable and justified objective over the life of the Core Strategy, given the increasing national consensus in favour of less harmful means of travel, balanced with short term economic restrictions on expanding public transport.
Alter	rnatives	
7.	<ol> <li>Can it be shown that the council's chosen approach is the most appropriate given the</li> </ol>	Alternative approaches and policy options are identified at an early stage of preparation in an Issues and Options Paper which was consulted on in May 2006 and a Further Options Report which was consulted on in November 2008. Further details are provided in the Consultation Statement.
8.	reasonable alternatives? Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?	Reasons for rejecting particular options are set out at the end of each section in the Consultation Draft Core Strategy published February 2010
		The most commented on alternatives considered during the preparation process concerning housing growth particularly the distribution of new housing, the identification of strategic housing sites and the allternative approaches to the provision of affordable housing.
9	Where a balance had to be	Distribution of Housing Development
0.	struck in taking decisions between competing alternatives is it clear how and why these decisions were made?	The Issues and Options consultation addressed this issue at the start of the preparation process when there was a broadly even split of support between options focussing development on Selby and/or Selby and the market towns of Tadcaster and Sherburn in Elmet, and those proposing a wider distribution of development including the villages. (See Appendix1 to Appendix D of the Draft Core Strategy Consultation Statement).
		The preferred strategy of focussing development on Selby was selected for the following reasons.
		The more diverse strategies were considered to be contrary to the Regional Spatial Strategy. For broad sustainability reasons, this strategy focussed development on the larger urban areas which limited growth outside Selby itself to that required to meet local needs.
		The option focussing development on Selby was assessed as the most sustainable by the Sustainability Appraisal.

Key question	Evidence provided
	However, when viewed in a more local context, limited development of an appropriate scale may be argued to assist in maintaining the vitality of individual settlements and its facilities, thereby balancing to some extent the broader view of sustainability. The undercurrent of support for some limited development within village settlements, particularly in the most sustainable ones chosen as Designated Service Villages, has been taken into account as far as possible in the final Strategy, whilst still remaining faithful to the principles embedded within the Regional Spatial Strategy.
	Strategic Housing Sites – Selby
	In pursuing a strategy focussing the majority of housing development in the Selby area, it was recognised that there would be a need for at least one strategic extension to the town. Six potential sites were identified and were the subject of a thorough analysis (See Background Paper No.7) and public consultation at the Further Options stage.
	Following this stage Sites A (Cross Hills) and D (Olympia Park) were selected as sites included within the Consultation Draft Core Strategy (February 2010), which also took into account the result of a sequential test undertaken as part of PPG25 Strategic Flood Risk Assessment These two sites received the most favourable responses during the consultation on the Further Options report. (see background paper No. 7 Strategic Development Sites)
	Following consideration of the response to the Draft Core Strategy Site A was subsequently de-selected as it was considered that the necessary groundwork to justify its commercial viability and ensure its implementation was not sufficiently advanced for it to be included as a Strategic Site at this stage.
	Affordable Housing Policy
	The affordable housing policy was unable to be fully developed until the Housing Market Assessment and the Economic Viability Study had been completed. The latter was completed in August 2009.
	Percentage Affordable Requirement
	Using the evidence of the potential variations in economic viability provided by the EVS, the Draft Core Strategy Policy CP5 aimed to provide a more flexible approach to these volatile economic circumstances by reviewing the percentage affordable requirement, through Supplementary Planning documents rather than the policy itself.
	Although a number of respondents welcomed this flexibility, others questioned the appropriateness of using supplementary guidance in this way. After further consideration and taking account of the other potential variables of economic viability, e.g the geographical location, the size of the development and individual site characteristics, the conclusion was reached that there would always be limitations on the applicability of any general requirement which offset the value of attempting to provide regular reviews.
	Consequently the Council has abandoned the proposal to include interim percentage requirements within SPDs

Key question	Evidence provided
	and adopted an alternative approach which sets out the upper parameter of its aspirations for affordable housing provision, given favourable economic circumstances, as tested in the EVS.
	It is acknowledged that there will be circumstances, particularly in the short term, when this target cannot be met and that there is flexibility on an individual scheme basis. However, it does provide a degree of certainty for developers in terms of an upper limit on the requirement.
	The approach may be criticised as leading to a higher proportion of cases where individual viability assessments have to be commissioned. However, in practice, in the present difficult circumstances, most schemes are the subject of such assessments in order to achieve a satisfactory negotiated settlement. Given the number of variable factors involved in viability, it is unlikely this approach would be significantly more onerous for the developer or the authority.
	Thresholds for On-Site Provision
	Policy CP5 – Affordable Housing – in the draft Core Strategy acknowledged the fact that 60% of affordable housing need arises outside Selby and attempted to achieve the provision of affordable housing in smaller settlements and on smaller sites. A threshold of 3 dwellings was proposed in Secondary Villages in order to encourage some limited provision closest to where the need arises.
	The lower thresholds were challenged at the Draft Core strategy stage consultation by a number of respondents and the Council therefore commissioned further work in order to test the viability. The conclusion of this work was that the 3 and 5 unit thresholds would not be sufficiently viable in even the most favourable conditions and that 10 units would be the minimum threshold at which on-site provision could be sufficiently viable. A higher threshold for the provision of affordable housing has therefore been proposed.
10. Does the sustainability appraisal show how the different options	Chapter 5 of the Sustainability Appraisal provides a comprehensive commentary on the inter-relationship between the Sustainability Appraisal and the Core Strategy production process.
perform and is it clear that sustainability considerations	Chapter 6 provides a comprehensive sustainability assessment of each policy.
informed the content of the development plan document from the start?	A separate SA on strategic development site options had previously been undertaken in conjunction with the publication of Further Options Report and details are reproduced in the Final SA report
11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?	The status of the Regional Spatial Strategy and the implications of the Localism Bill is considered in an explanatory statement at the beginning of the Submissions Core Strategy.
	While RSS and the accompanying evidence base provide a context for the Core Strategy preparation particular emphasis has been placed on developing the role of places and local issues in Chapters 2, 3 and 4 and
12. Does the strategy take forward the regional context reflecting	throughout the document. Examples include:

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Key question	Evidence provided
the local issues and objectives?	Expansion of the RSS spatial development strategy, particularly with regard to the role of village settlements which is an important for issue for this rural District.
	local affordable housing thresholds and targets
	local policies for economic growth and town centre development
	Policies for climate change, sustainability, energy efficiency, environmental protection features, which feature issues of particular relevance to the District, including specific requirements for larger sites.

Key question	Evidence provided
Effective	
Deliverable	
<ul> <li>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</li> <li>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</li> </ul>	Paragraphs 2.38 – 2.46 outline the Key Issues for the Strategy. The Spatial Development Strategy establishes the broad approach to development in the District through a spatial vision and accompanying aims and objectives. The individual polices set out the Council's requirements for achieving sustainable forms of development. Together these provide a comprehensive strategy for influencing development within the District over the next 15 years or so
15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?	The Council has consulted all adjoining Local Planning Authorities, the Regional Planning Authority, (up until the point it ceased to exist and Government Office for Yorkshire and the Humber) during the preparation of the Core Strategy. No adverse comments suggesting any potential cross-boundary conflict on policies or issues that require further investigation have been received have been received.
	The main cross-boundary issue relevant to the Strategy is the strong linkage between Selby District and surrounding larger towns and cities, leading to out-commuting for housing, employment and retailing and other services. The issue was included as one of the Key Issues for the Core Strategy.
	Cross boundary issues regarding housing markets, employment growth and communication linkages and transport were also debated during the RSS process as Selby falls within both the Leeds City Region and York sub-area.
	Both RSS and the Core Strategy acknowledge the high levels of commuting from Selby District to surrounding towns and reinvigorating and developing the economy is identified as a Key Issue and Challenge in the Core Strategy in order to create a more self-contained, sustainable way of life for the Districts residents. A similar scenario applies to retailing and the development of an improved level of services generally within the District.
16. Does the development plan document contain clear objectives?	The Core Strategy incorporates a spatial portrait and identifies key issues in Chapter 2 and sets out a clear vision with aims and objectives in Chapter 3.
17. Are the objectives specific to the place; as opposed to being	The objectives have been selected to address the identified key issues particularly the overriding priorities of

Key question	Evidence provided
general and applicable to anywhere? 18. Is there a direct relationship between the identified issues and the objectives?	developing the economy and creating a more sustainable development pattern.
	Other objectives acknowledge the broadly rural nature of the District and emphasise the importance of protecting its character and its settlements in line with national policy.
	General consensus on objectives has been achieved through the consultation process.
	Prior to finalising the Draft Core Strategy, the spatial portrait, aims and objectives were refined to better reflect a place based approach as advocated by CABE.
19. Is it clear how the policies will meet the objectives?	A list of the relevant strategic objectives is included at the beginning of each section dealing with individual policies.
20. Are there any obvious gaps in	It is considered the policies cover all the objectives and there are no significant gaps.
the policies, with regard to the objectives of the development plan document?	The Core Strategy policies have been drawn up specifically to achieve the objectives identified in Chapter 3.
21. Are there realistic timescales related to the objectives?	The Core Strategy is a strategic document and the policies provide a flexible framework to guide development and the production of future site specific/detailed Development Plan Documents. Examples of realistic timescale setting are as follows:-
	a)Chapter 5 includes a housing management policy aimed at ensuring a continuous supply of land in accordance with PPS3. Land release can be managed to meet the need and in response to unexpected events such as previously developed land becoming available.
	b)Paragraph 5.37 provides an indication of how the Strategic Development Site (Policy CP2A) will be phased to achieve a smooth delivery process, beginning with an early phase adjacent to the A19. The proposed master plan will provide greater detail on the phasing process.
	c)Paragraphs 5.40 and 5.41 of the Core Strategy set out the timescales envisaged for bringing forward the main sources of residential land which is based on consultation with housebuilders.
	d)Similarly the Core Strategy plans for positive employment growth which will be monitored on an annual basis.
	e)Trends such as reducing the proportion of outward commuting can generally only be reliably monitored through the national census, so 2021 is used as a timescale. (See Figure 13)
	f)A positive trend in the number of houses being built to higher national sustainability standards can be monitored on an annual basis.
	g) Policy CP14 includes a target date of 2021 in setting the Districts target contribution toward renewable energy based on robust sub-regional studies.

Key question	Evidence provided
22. Are the policies internally consistent?	The Core Strategy objectives were developed at the outset of the process (See Issues and Options report and Draft Core Strategy) and have progressed through successive stages with subsequent amendment and refinement to reflect stakeholder comments.
	The Sustainability Appraisal assessed the Core Strategy objectives against the sustainability appraisal objectives and found no cases where two sets of objectives were clearly incompatible. (In some cases compatibility depended upon how the objectives were interpreted in terms of implementation) (See Table 2 of the Appraisal.)
	The relationship of the Core Strategy with other Local Development Documents and the chain of conformity are set out in the current (fourth) Local Development Scheme (October 2010).
23. Does the development plan document contain material	The Core Strategy is one of three Development Plan Documents being prepared which together will form the basis for planning decisions within the District up to the next 15 years.
<ul><li>which:</li><li>is already in another plan</li><li>should be logically be in a</li></ul>	The Core Strategy is a non- site specific document, other than for the Strategic Housing and Employment Site proposed for Selby. It is complemented by both the Site Allocations DPD and the Development Management DPD which will be prepared in that order. (See 4 <sup>th</sup> Local Development Scheme, 20.10.11)
different plan	Policies CP13 and CP14
<ul> <li>should not be in a plan at all?</li> </ul>	Government Office identified potential conflict of parts of Policies CP13 and 14 with the County Council's Waste and Minerals policies respectively. Following consultation a cross reference to the County Council policies has been included in order to avoid any confusion.
24. Does the development plan document explain how its key policy objectives will be achieved?	The Core Strategy aims to provide a framework to assist the development of the spatial strategy and vision of the Sustainable Community Strategy for Selby District and link with other Council plans. (See Paragraphs 5.25.8 of the Local Development Scheme).
	The Draft Core Strategy (at the time it was published) was judged to be in conformity with the Regional Spatial Strategy by Local Government for Yorkshire and the Humber, who wrote to the Council to that effect as part of their consultation response.
25. If there are development management policies, are they supportive of the strategy and objectives?	Policies CP1A, CP2A, CP3, CP5, CP6, CP7, CP10 and CP11(B) incorporate development management elements.
	Policy CP1A complements the housing distribution strategy by providing greater clarity about the way proposals for speculative residential development will be managed to meet the twin objectives of meeting housing needs as locally as possible but without unduly compromising broader sustainability objectives. This is an important

Key question	Evidence provided
	issue in a rural district such as Selby.
	CP2A is intended to facilitate delivery and comprehensive planning of a strategic development site
	CP3 provides guidance to facilitate the maintenance of a five year housing land supply through the development management process.
	CP5 and CP6 provide mechanisms for securing the delivery of affordable housing.
	CP7 includes criteria to control proposals for gypsy and traveller pitches.
	CP10 includes criteria to facilitate rural diversification.
	CP11(B) complements the strategic vision for developing and enhancing the 3 town centres.
26. Have the infrastructure implications of the strategy/policies clearly been identified?	The Infrastructure Delivery Plan provides the most up to date information on infrastructure requirements and programming. Evidence has been supplied by a range of infrastructure and service providers.
27. Are the delivery mechanisms and timescales for	Core Strategy Chapter 8 (Paragraphs 8.10 to 8.13) deals with delivery. Figure 13 provides information on the delivery agencies associated with each policy.
implementation of the policies clearly identified?	Paragraphs 5.40 and 5.41 of the Core Strategy set out the timescales envisaged for bringing forward the main sources of residential land.
	The main site specific proposal within the Strategy is the Strategic Housing and Employment Site at Olympia Park, Selby. A Delivery Framework document prepared jointly by the landowners demonstrates the viability and deliverability of the scheme, which also benefits fro a 'Concept Plan' prepared in consultation with the local community and key stakeholders.
	A Site Allocations DPD is currently in preparation, which will identify specific sites for development and their phasing in order to ensure delivery of housing, employment and other land uses, together with associated infrastructure and services.
28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?	Details are provided in the accompanying Infrastructure Delivery Plan and the Delivery framework document for the Olympia Park strategic development site.

Key question	Evidence provided
29. Is it clear who is intended to implement each part of the strategy/ development plan	The Infrastructure Delivery Plan provides the most up to date information on infrastructure requirements and programming. The Council has liaised fully with all the main infrastructure providers who support the proposals of the Strategy.
document? 30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?	The Strategic Housing and Employment site at Olympia Park, Selby is the major site specific proposal within the Strategy which is supported by a Delivery Framework Document. This includes consideration of the infrastructure implications.
	Core Strategy Chapter 8 (Paragraphs 8.10 to 8.13) also identifies other agencies that are responsible for delivery and Figure 13 provides specific information on the delivery agencies associated with each policy.
<ul><li>31. Does the development plan document reflect the concept of spatial planning?</li></ul>	The Core Strategy has a spatial development strategy at its core (See Ch 4) but also includes policies relating to a broader range of topics such as: Community Services and Infrastructure (CP8), supporting Green Infrastructure; and Improving the Quality of Life (Ch 7) with strong emphasis on sustainable development issues, improving resource efficiency, reducing carbon emissions and increasing biodiversity.
32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?	Policy CP16 on Design Quality refers to a variety of issues relating to well being including promoting healthier communities, addressing crime reduction and community integration issues.
33. Does the development plan document take into account matters which may be imposed	The Council is not aware of any matters which may be imposed and significantly affect the Strategy, other than possibly resource constraints in the current economic climate. Generally the Government's emphasis is on local determination of issues rather than imposition.
by circumstance, notwithstanding the council's views about the matter?	It is considered that the strategy is sufficiently flexible to allow for an appropriate response to a reduced resource input. The main effect is likely to be a slippage in timescales rather than a major alteration to strategy.
Flexible	
34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in,	The Strategy will be closely monitored (See Table 13). The Strategy has been formulated to provide a flexible process rather than rigidly adhere to fixed timescales. For example Policy CP3 specifically outlines the process to be used to approach regulate housing land release.

Key question	Evidence provided
circumstances?	Probably the single greatest threat to the Strategy would be the failure of the Olympia Park Strategic Housing site to become operational within the next five years. However, the extent of preparatory and pre-application work undertaken to date gives the Council confidence that the development will progress as planned, provided general market conditions continue to improve. (The developers are intending to submit relevant planning applications autumn 2011)
	In the event of significant slippage occurring, the Council would consider bringing forward a number of smaller sites in the Selby area which are being identified in the Site Allocations DPD.
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy?	While a number of issues have been raised throughout the preparation process regarding the capacity of key settlements to accommodate continued growth,, particularly Selby, the evidence base demonstrates how potential flood risk and highway constraints may be overcome.
	In addition work undertaken in connection with the SHLAA, the Sequential Test undertaken in connection with the PPS25 SFRA, and the Site Allocations DPD demonstrate that there is a healthy supply of potential development land well in excess of the current identified requirement.
	A significant upward increase in the level of growth proposed at some point in the future could therefore be accommodated though proportionate increases across the settlement hierarchy, and or by promoting a slightly enhanced role for the two local service centres, without compromising the existing settlement pattern.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	The main areas where the strategy may most obviously be monitored as not performing, are in terms of housing and employment delivery. Whilst the Strategy cannot influence the general health of the housing market, it can have some influence on housing delivery in terms of supply of housing land. Policy CP3 aims to ensure that there is an adequate supply of land. Close monitoring will ensure that remedial action can be taken if housebuilding in the District is not keeping up with forecast and national trends.
	It is less easy to be specific with regard to employment growth. However, close monitoring of trends will indicate whether the direction of change is positive. Policy CP9 is considered sufficiently flexible to accommodate most implementation measures aimed at making the District a more attractive location for employment growth. Lack of employment land in itself is unlikely to be an issue, provide the provisions of Policy CP9 are implemented.
Monitoring	
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including	The submission Core Strategy includes a monitoring and implementation framework based on policies, objectives, intended outcomes, indicators and targets (Chapter 8).
	The Submission Core Strategy also includes a housing trajectory (See Paragraph 5.42 ) which will be updated annually in the Annual Monitoring Report

Key question	Evidence provided
housing trajectories where the plan contains housing allocations?	
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	Paragraphs 8.5 - 8.9 of the Submission Core Strategy describes three types of indicators and explains how indicators and targets will be measured through the Annual Monitoring Report. The Annual Monitoring Report will also record progress on meeting Local Development Scheme milestones and effectiveness of policies.
39. Are suitable targets and indicators present (by when, how and by whom)?	The submission Core Strategy includes a monitoring and implementation framework based on policies, objectives, intended outcomes, indicators and targets which is summarised in Figure 13(See Chapter 8), which also identifies delivery agencies.

Key question	Evidence provided
National policy	
<ul> <li>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</li> <li>41. If yes, is there a local justification?</li> </ul>	Full account has been taken of national planning policy in the preparation of the Core Strategy.
	The Strategy has been amended since the publication of the Draft Core Strategy in February 2010 to ensure compliance with the latest versions of national policy which have been introduced.
	This includes the comprehensively revised PPS4 and the amendments to PPS3 with changes to the categorisation of 'garden land' as previously developed land.
,	Views expressed by the (former) Government Office at each stage of preparation have also been taken into account.
	Policies which may be perceived as not fully consistent with national guidance are: CP5 Affordable Housing, CP9 Scale and Distribution of Economic Growth and CP11 Town Centres and Local services.
	CP5
	PPS 3 indicates a national indicative site size threshold of 15 dwellings. Policy CP5 utilises a minimum threshold of 10 dwellings for on-site provision and also provides the potential to negotiate commuted sums to contribute towards affordable housing provision elsewhere.
	PPS 3 does, however, allow lower thresholds to be used where viable and practicable, including in rural areas. The assessment of housing need in the Strategic Housing Market Assessment indicates an affordable housing requirement over the next 5 years which is almost equal to the overall housing provision figure. In these circumstances, and as market housing is likely to be the principal source of funding for affordable housing over the life-time of the strategy, it is considered that the evidence provides justification for aiming to achieve the maximum level of affordable housing provision, subject to viability considerations.
	The Economic Viability Study justifies a reduction in the threshold for on-site provision to 10 dwellings subject to appropriate market conditions. The Council also considers that, below that level, an appropriate, smaller contribution per house should be negotiated. The contribution per site would not total more than the equivalent of the cost of one affordable dwelling and would be subject to prevailing viability conditions.
	CP9/CP11
	Whilst Policy CP9 gives priority to achieving business, professional and financial services in Selby Town centre, it does not preclude out of centre locations close to the Selby By-pass. CP11B(b) indicates that any such development proposals outside town centres should, however, be subject to the sequential approach as set out in PPS4 and which will be subsequently elaborated on in site specific DPDs.
	The Employment Land Study 2007 undertaken by GVA Grimley on behalf of the Council identified growth in

Key question	Evidence provided
	financial, business and insurance services are expected to experience the highest growth within the local economy. In addition the Study noted that Selby is well placed to benefit from overspill of highly skilled, knowledge based forms of employment from other parts of the Leeds City Region including York.
	In these circumstances and in accordance with the aspirational approach taken towards economic growth in the Strategy (see Para 6.11), the Council has taken the view that there is justification for identifying areas for B1 type uses, other than solely the town centre. Selby is a relatively small town and opportunities within and immediately adjacent to the town centre are limited. In order to ensure that the District capitalises on these trends, should sites closer to the centre not be available, it is considers that reference to the possibility of utilising sites adjacent to the by-pass is fully justifiable under the guidance of PPS4.
42. Does the development plan	Policies CP10 and CP12 may be perceived as not adding significantly to national guidance.
document contain policies that do not add anything to existing	Policy CP10 Rural Diversification
<ul><li>43. If so, why have they been included?</li></ul>	While this policy reflects elements of PPS4, it is considered important in a rural area to provide a local context for rural diversification which is missing from the PPS.
	Policy CP12 Sustainable Development and Climate Change
	It is recognised that part of this policy is not a locally distinctive policy. However, it does reflect locally important issues (such as flood risk, and renewable energy) and provides an over-arching policy by pulling a range of issues together in order to establish the Council's commitment to climate change issues in a spatial plan.
	Because of the strategic nature of the policies in the Core Strategy there is bound to be some degree of overlap with other strategic guidance e.g national planning guidance. Every effort has been made to minimise this and make the policies as local as possible, duplicating national policies, only where it would be inappropriate to move to the next level of detail; and where it is considered they should be included in order to create a well rounded, 'one-stop' policy framework covering all the main themes of the Strategy.