

WISTOW PARISH COUNCIL

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29 March 2010

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Civic Centre
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Selby
YO8 4SB

DATE RECEIVED & LOGGED	LAST REPLY DATE
31 MAR 2010	22 APR 2010
SELBY DISTRICT COUNCIL PLANNING	

Dear Mr Hesleton

RE :- Selby District Consultation Draft Core Strategy

In previous correspondence to your committee Wistow Parish Council has objected strongly to Wistow being classified as a 'Service Village'. The Parish Council cannot understand the reasoning behind this classification when compared to villages like Brayton, Riccall, Hemingbrough and Thorpe Willoughby. These villages have larger populations, far better services of shops, transportation, etc, and are on major 'A' roads, compared to Wistow, which is on a 'B' road.

For a number of years Wistow has had no shops, garages or medical facilities. It has a poor bus service, which has been heavily subsidised for the past few years. The only eating-place is the local public house/post office and this is struggling to survive in the present economic climate.

Your projection of growth for the village of 20% is totally unreasonable. You have failed to take into account the occasions of flooding in the village over the past 20 years. In 1982 the village was virtually cut off by floodwater for almost a week. During that time at least 12 dwellings were affected by floodwater and large areas of farmland was also inundated.

A flood in 2000 also affected parts of the village and led to severe drainage problems. In this event the pumps that move sewage/surface water to the sewage separation plant failed to cope with the increase in flow.

The problem with the sewage system also occurred in 2007 when, due to excessive rainfall in the village, the existing sewage, water system was unable to move the volume of effluent out of the village. The village was virtually isolated for a period of 24 hours. One property was severely flooded in Station Road.

A significant increase in the number of properties in the village will increase the flows of both surface and sewage into the combined system, which will undoubtedly lead to an increase in the frequency of flooding.

None of the other 'Service Villages' have suffered severe flooding, similar to Wistow, in the past 40 years.

Wistow is close enough to Selby for local services not to be developed in the village. A local shop, which closed a number of years ago could not compete with the large supermarkets only 3 miles away in Selby. Provision of other services (e.g. surgery, butchers, etc) would also not be viable.

The local bus service, which runs on an hourly basis, is a reflection of the increased use of the car. In the 1960's 4 bus company's competed for customers. On a typical market day (Monday) the buses ran a 30minute service to Selby from the village!

In terms of job opportunity there are no major businesses. The existing Wistow Mine closed in 2001. Wistow Parish Council, Selby District Council and North Yorkshire County Council are contesting the application for use of the site for industrial use. Apart from agriculture, which is heavily mechanised, no other major employer exists in the village.

A significant number of residents of the village work far away from the community during the working day, but enjoy the tranquillity and surroundings of the present village structure. These residents live in Wistow to enjoy its rural peace and quiet. Large-scale development would ruin this characteristic.

This Parish Council and the majority of its residents are totally against the plans submitted via the Consultation Core Strategy for the village of Wistow. The Parish Council requests a reconsideration of Wistow as a 'Service Village' and would welcome an early discussion with you as to the issues concerned.

Yours sincerely


J W Wildash

Cc Mr John Cattanach

SELBY DISTRICT COUNCIL PLANNING	
31 MAR 2010	22 APR 2010
DATE RECEIVED & LOGGED	LAST REPLY DATE

Comment ID DCS/80
Consultee ID 416380
Agency ID 416372

ryan king

From: Leeming, Paul [Paul.Leeming@carterjonas.co.uk]
Sent: 31 March 2010 09:37
To: ldf
Subject: Selby LDF - Core Strategy - Consultation Draft February 2010
Attachments: Microsoft Word - 16098 240310 Grimston Park Core Strat Reps.pdf

Dear Mr Heselton

We have pleasure in submitting representations on behalf of the Grimston Park Estate which has land interests in the northern part of the District. The submission deadline 1700 on Thursday 1 April 2010. We would be grateful for an acknowledgement of receipt.

These representations are inherently not site specific and deal with the main components of the Core Strategy as it sets the future spatial planning and policy direction for the District for the period to 2026 and beyond.

Overall we commend the Council for producing this document, but consider that there are a number of failings which should be easy to remedy.

AN approach which encourages development towards Tadcaster is also welcomed.

We look forward to working with the Council in taking the Core Strategy towards adoption.

One major concern that we do have, following discussions with your team, is that the LDS is likely to be revisited with the Selby AAP and Allocations DPD to be merged. We would be grateful for clarification of any revisions (particularly delays) which may result.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

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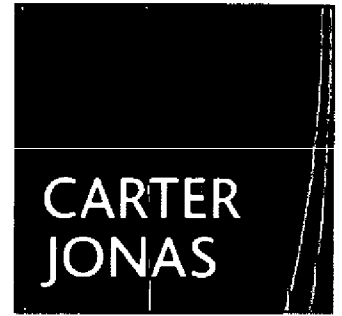


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**SELBY CORE STRATEGY
CONSULTATION DRAFT**

**PUBLIC CONSULTATION SPRING 2010
REPRESENTATIONS**

on behalf of

THE GRIMSTON PARK ESTATE
Land at Tadcaster, Ulleskelf and Towton

24 March 2010



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1.0 INTRODUCTION

- 1.1 Carter Jonas LLP welcomes the opportunity to comment upon the Consultation Draft Core Strategy document (the "Draft Core Strategy") as published by Selby District Council (The Council) in February 2010.
- 1.2 These representations are submitted on behalf of our client, The Grimston Park Estate, with respect to their land and interests in the north west of the District, in particular around Tadcaster and Ulleskelf.
- 1.3 On behalf of this client (and others), we have submitted representations to the Further Issues and Options Core Strategy during December 2008 and contributed to the Council's Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and Economic Viability Study during 2009 and 2010. In terms of the SHLAA on behalf of the Estate we have lodged some six sites with the Council totalling over 20ha of land and capable of accommodating some 600-650 dwellings.
- 1.4 Carter Jonas LLP is also involved in the preparation of LDF's in the neighbouring authorities of Leeds, Wakefield, York (plus Harrogate & Ryedale) and the East Riding of Yorkshire and will actively participate in the development of the forthcoming Integrated Regional Strategy. Consequently we are aware of spatial planning issues in adjoining Districts.
- 1.5 Carter Jonas LLP is keen to work with the Council in bringing forward the Core Strategy and other LDF documents. When adopted we consider that the Core Strategy should lie at the heart of the Council's LDF and be able to guide development across the District for the period to 2026, and beyond.
- 1.6 In preparing our response to the current consultation document it is worth briefly revisiting comments made to the Core Strategy Further Options consultation during December 2008, as we are of the view that, whilst a number of our comments have been considered and taken on board in the current document, some remain to be addressed. Those previous representations covered the following broad areas:



- A general failure to provide a context to the production of the Core Strategy in relation to the RSS, Community Strategy, RES, physical constraints and the socio economics of the District;
 - No clear aims or objectives were outlined to link the policy proposals;
 - There was a lack of clear options underpinned and justified by an appropriate evidence base;
 - A lack of strategy to deal with Green Belt review (to accommodate further development) in the District;
 - Querying the distribution of housing development across the District which placed an emphasis upon Selby and Sherburn in Elmet;
 - A failure to identify an appropriate strategy of growth to support the regeneration of Tadcaster;
 - Support for Ulleskelf to be identified as a "Primary village";
 - Comment on specific urban extension options in Selby; and
 - Comments upon employment land.
- 1.7 In responding to the current Consultation Draft Core Strategy, we have full regard to the Regional Spatial Strategy (RSS); the proposals for the progression of an Integrated Regional Strategy, the latest guidance from the NHPAU and other evidence including the Council's Background Papers, the SHLAA/SHMA and viability Study, and the Employment Land Study.
- 1.8 Against this broad background, our representations are set out in the following format:
- **Section 2** outlines the prevailing policy context having regard to the RSS, PPS1, PPG2, PPS3, PPS4 and PPS12.
 - **Section 3** sets out our response to the Consultation Questions.
 - **Section 4** sets out our summary and conclusions.
- 1.9 A copy of the Council's the response form is not appended to this statement.



2.0 PLANNING POLICY CONSIDERATIONS

2.1 Selby Council's LDF needs to be in broad conformity with a range of planning policy considerations including Government Guidance and the RSS and our response to the Consultation is informed by these. As such it is considered appropriate to briefly give a flavour of them as these inform our representations to the Consultation Draft Core Strategy (referred here after as the "Draft Core Strategy").

Government Guidance

2.2 A revised **PPS12 (Local Development Frameworks)** was issued in June 2008. This sought to simplify the consultation stages and the tests of 'soundness' for the preparation of LDF documents. Whilst the tests themselves were reduced in number from their predecessor, the underlying principles remain and require the Core Strategy to:

- provide clear, flexible and deliverable policies;
- be underpinned and supported by a robust evidence base;
- be supported by evidence of community and stakeholder input; and
- to demonstrate coherence with other plans, strategies and spending programmes.

2.3 Overall the Core Strategy should reflect the needs and requirements specific to the District and be flexible to changing circumstances.

2.4 PPS12 is clear that the Policies of the Core Strategy should clearly set a "place-making agenda" and tie to a vision. The vision should in turn be developed following; *'analysis of the characteristics of the area and its constituent parts and the key issues and challenges facing them'*. The policies and objectives of the Core Strategy should then work towards the fulfilment of this vision having regard to the full range of considerations and indicators.

2.5 Flexibility is considered central to the development of a robust Core Strategy capable of adjusting to accommodate changing circumstances. In this context paragraph 4.14 states that the Core Strategy:

'should not need to be updated simply because there has been a change in the housing numbers in the regional spatial strategy'.

2.6 Normally sites should not be identified within the Core Strategy; PPS12 does recognise



that the Core Strategy can be used to identify "areas of search" or strategic locations for development where they are central to the attainment of the strategy and may require a long lead in, as well as to enable the provision of key infrastructure improvements. Favoured sites should be shown to best tie to the vision identified (para. 4.6 and 4.7).

- 2.7 The Core Strategy is required to be supported by evidence of what physical, social and green infrastructure is needed to enable development (para 4.8 and 4.9). Information should look at who will provide infrastructure and when it will be provided, working towards the aspiration of aligning infrastructure provision with the delivery of the Core Strategy.
- 2.8 Turning to other guidance: **PPS1 Sustainable Development** states that the overarching objective of the planning system is sustainability; in social, physical, economic, energy, environmental and aesthetic terms. Within the document these aspirations are held to be equally applicable to urban and rural settings and environments.
- 2.9 Various supplements have been published to support PPS1 including an Annex on Climate Change.
- 2.10 **PPG2 Green Belts** sets out the purpose of including land in the Green Belt, these being:
- To check the sprawl of large built up areas;
 - To prevent towns from merging into each other;
 - To assist in safeguarding the countryside;
 - To preserve the setting and character of historic towns; and
 - To assist the process of urban regeneration by encouraging the recycling of derelict and other urban land.
- 2.11 When setting Green Belt boundaries, in accordance with guidance contained in PPS12, paragraph 2.8 of PPG2 is clear that the boundaries set must endure and should:

'be carefully drawn so as not to include land which it is unnecessary to keep permanently open. Otherwise there is a risk that encroachment on the Green Belt may have to be allowed in order to accommodate future development. If



boundaries are drawn excessively tightly around existing built up area it may not be possible to maintain the degree of permanence that Green Belts should have. This would devalue the concept of the Green Belt and reduce the value of local plans in making proper provision for necessary development in the future'.

2.12 Reflecting the need for Green Belt boundaries to endure, paragraph 2.12 of PPG2 states that:

'to ensure protection of Green Belts within this longer timescale, this will in some cases mean safeguarding land between the urban area and the Green Belt which can be required to meet longer term development needs... In preparing and reviewing their development plans authorities should address the possible need to provide safeguarded land'.

2.13 Annex B to PPG2 sets out further guidance on the process of identifying safeguarded land. It considers that such land should be identified in suitable locations having regard to matters such as transport and accessibility.

2.14 Government Guidance relating to Housing is contained in **PPS3 Housing**. When published this provided a step change in how housing delivery should be managed. It states that housing delivery should reflect a more responsive approach to land supply so that delivery is assured. As a consequence it is less dogmatic on housing density and the use of brownfield land than its predecessor, requiring Local Planning Authorities to demonstrate how they can be certain that through the planning process, the framework will be set to deliver necessary housing in the correct locations.

2.15 Overall the emphasis is upon providing high quality housing for all in suitable locations; widening opportunities for home ownership; improving affordability by increasing the supply, mix and choice of housing; and the creation and maintenance of sustainable urban and rural communities.

2.16 To the individual this means that:

'everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.' (Para. 9).

2.17 Employment and economic development matters are covered in the recently published **PPS4 Planning for Sustainable Economic Growth** (December 2009). This represents a



shift towards a more positive and holistic interpretation of economic growth which acknowledges the role of all sectors in producing and delivering growth; a step forward given the thinking in previous guidance. PPS4 is focused on: raising productivity, improving accessibility, the consideration of a wider test of 'need', promoting social inclusion, building prosperous communities, creating additional employment and linking employment with housing provision including the delivery of investment in all locations.

2.18 Policy EC1.1 entitled '*Using Evidence to Plan Properly*' calls for joint and cooperative working between authorities (and stakeholders) in the preparation of a robust evidence base which should be proportionate to the importance of the issue. In preparing the local evidence base, EC1.3 suggests that it should be informed by the regional assessments, assessing the detailed need for land or floorspace for economic development along with an assessment and review of existing site allocations, preferably undertaken alongside preparation of the SHLAA.

2.19 Policy EC2.1 requires that policies in the development plan should:

- Set out a clear economic vision;
- Support existing business sectors and accommodate emerging and new sectors, allowing for a quick response to changes in economic circumstances;
- Take into account the location and industry specific requirements of business;
- Place and co-locate developments which generate substantial transport movements in locations which are accessible, avoid congestion and preserve local amenity;
- Enable the delivery of sustainable transport and other infrastructure needed to support planned economic development, where necessary providing advice on phasing and programming of delivery;
- Safeguard land from other uses, identifying land for a broad range of economic development including mixed use; and
- Consider how different sites can be delivered including the use of compulsory purchase and other planning tools.

2.20 A timetable has been produced suggesting a comprehensive review and simplification of range of national Planning Policy Statements. During the consultation period, a new



Statement PPS5 has been published setting out guidance on **Planning and the Historic Environment**, replacing PPG15 and 16.

Regional Policy

- 2.21 Adopted in May 2008 the **Regional Spatial Strategy: The Yorkshire and Humber Plan** (RSS) provides the overarching framework with which the Core Strategy must be in broad conformity.
- 2.22 Within the document, Leeds is identified as the Regional city which should be a focus for housing, employment, shopping, leisure, health and cultural activities and facilities in the Region as well as acting as the hub for the City Region. Reflecting this role **Policy H1** requires Selby Council to deliver 390 homes per annum for the initial period to 2004 and 2008, followed with uplift to 440 homes per annum for the period 2008-2026.
- 2.23 **Policy E1** seeks the creation of a successful and competitive regional economy with Leeds at its heart and as the engine for economic growth. Across the Region annual job growth targets have been set. For Selby District the number of jobs is expected to fall by 60 per year (i.e. 1,200 in the period to 2026). This is explained in broad terms through Table 11.2 which looks at employment by Land Use; suggesting that Selby District will see an increase in retail /leisure jobs (+30) along with health & education (+10) but a net decrease as a result of losses in Industry (-20) and other uses (-90) for example construction and agriculture.
- 2.24 **Policy YH7** urges a transport oriented approach for the identification and phasing of development sites having regard to the capacity of existing transport infrastructure and the potential for deliverable improvements. Consistent with national guidance the policy gives first priority to the re-use of previously developed land and buildings, second to suitable infill opportunities and third to extensions to the relevant town or urban area. Supporting paragraph 2.56 highlights the importance of facilities such as railway stations, park and ride sites and public transport /bus corridors which can act as nodes for development to encourage modal shift and increase the use of public transport.
- 2.25 **Policy YH9** specifically addresses the issue of Green Belt in the Yorkshire and Humber Region, suggesting that their broad extent should not be changed. Part C is specific to



the York Green Belt primarily to confirm the inner boundaries. Part D is specific to the West Yorkshire Green Belt, suggesting that a (strategic) review may be required to deliver longer term housing growth, with Part B suggesting that localised reviews may be necessary to deliver the core approach.

- 2.26 Selby District falls to be considered under two sets of sub area policies, within the Leeds City Region (the principal economic driver of the Region) and as part of the York Sub Area.

Leeds City Region

- 2.27 **Policy LCR1** is specific to the Leeds City Region including the City and District of Leeds and highlights the role of Leeds as the regional city in particular (LCR1 A2) to

“develop the role of Leeds as a Regional City, by accommodating significant growth in homes and jobs and continuing to improve the city centre’s offer of higher order shops and services”.

- 2.28 Reflective of this it supports role of Leeds (and Bradford) as the engine of the Regional economy and that the benefits of growth should be spread across the region to the other major and principal towns, including developing complementary and supporting roles for the overlapping parts of the York Sub-Area.
- 2.29 In achieving the transport aims LCR1 suggests that strategic patterns of development should seek to maximise opportunities which favour non-car modes and reduce the overall need to travel. Under LCR1E, the patterns of development seek to encourage growth in the south of the City Region and manage growth across the north with a greater emphasis upon delivering affordable housing.
- 2.30 A review of the RSS, the 2009 Update was started with the aim of increasing the Regional housing requirement following the publication of advice from the National Housing and Planning Advice Unit (NHPAU). The 2009 Update has been abandoned following the Government’s Sub National Review with work undertaken now to be carried forward through to the Integrated Regional Strategy (IRS).
- 2.31 We are aware that Leeds City Council raised concerns regarding the advice from the



NHPAU in their representations to the 2009 Update. It is worth pointing out that the NHPAU has issued further advice in July 2009 which raises the bar further suggesting a higher housing requirement for the Region in the period to 2026. That advice reminds us that the current economic crisis will pass and that ambient housing requirements will remain and need to be planned for.

2.32 An important consideration is the emergence of the Forerunner status for the Leeds City Region (LCR) governance structure. A number of publications have been released following the launch of the forerunner including the Housing & Regeneration Strategy & Investment Framework (November 2009). It recognises that the LCR is facing some of the most significant economic challenges for a generation including, declining economic output, rising unemployment, increasing business failure rates in particular with SME's and stalling renaissance projects across the city region.

2.33 In response the SIF sets out a vision for the LCR which seeks:

"A City Region working together promoting distinctive, aspirational and connected places that meet the needs of a growing sustainable and competitive economy. "

2.34 This sets out five priority aims of

- accelerating the delivery of sustainable communities housing growth and a move towards a low carbon economy;
- delivering a balanced housing supply ...reflecting economic growth and regeneration priorities;
- extending housing choice and affordability;
- achieving innovative and efficient solutions; and
- achieving more aspirational economic outcomes.

York Sub Area

2.35 All of Selby District is contained within the York Sub Area, although it is noted that there are particularly strong economic and housing market linkages to the Leeds City Region (as discussed above).



- 2.36 York is regarded as dominating the Sub-area which has seen a population growth of some 10% since 1982, with the remainder of the Sub Area growing by nearly 15%. Tourism is seen as the major generator of activity in the City supported by an economy diversifying into bioscience and IT/digital clusters.
- 2.37 Much of Selby (District)'s growth resulted from the coalfield and good connection to Leeds and York for commuting. Selby (town) is identified as the principal focus of housing and employment growth for the District, with economic diversification and increased job opportunities to address issues resulting from the decline of the coal industry.

RSS Review

- 2.38 A process to roll forward the current RSS to 2031 and to incorporate it into a combined regional document is currently under way. Known as the **2010 Update**, this document is being prepared by the Regional Authorities with particular emphasis on strengthening the links between the planning system and economic development. A draft version of the document will be published in the late summer (August 2010) with a view to adoption by late 2011.
- 2.39 A main emphasis of the document is the potential to raise housing targets by between 18 and 36%. It is apparent from the timetable published by the Regional body that preparation of the IRS should parallel the Core Strategy and consistent with our previous representations, Carter Jonas LLP will continue to support any uplift to the regional housing target.



3.0 THE CURRENT CONSULTATION

Commentary

- 3.1 Having read through the Consultation Draft Core Strategy and much of its supporting evidence we feel that the Council should be commended for the preparation of a document which is more comprehensive, coherent and thorough than its predecessor.
- 3.2 Generally, the document and supporting material are clearly laid out and well presented. The use of colours, diagrams and illustrations is helpful as is the use of a paragraph numbering system which assists with referencing.
- 3.3 There are parts of the Draft Core Strategy and the supporting background documents which are inconsistent in detail, order and structure, and there are minor typographic errors throughout the text. Some of these are mildly confusing but none are considered to undermine the general thrust and understanding of the document
- 3.4 Nevertheless we have concerns over elements of the Draft Core Strategy and suggest ways in which it can be improved to best reflect prevailing national and regional policy and deliver the Council's aspirations for the District. A number of these matters have been discussed with Officers and we are happy to enter into positive dialogue with Officers as the Core Strategy moves towards Submission and subsequent adoption.
- 3.5 Set out in the following sections are our representations in respect of the Draft Core Strategy; reference is made to the page, paragraph and policy number where appropriate.

Introductory Chapter

- 3.6 In line with our comments set out in Para 3.1 above, the current version of the draft Core Strategy is considered to be a significant improvement upon the previous consultation and the explanatory section set out in paragraphs 1.1 to 1.14 is helpful for the Core Strategy "*story so far*".
- 3.7 A Policy context is set out which indicates the various changes that may (or may not) occur at the regional level with the Integrated Regional Strategy. In these circumstances,



it is considered that the approach laid out at paragraph 1.17 is a prudent and pragmatic approach as a result of the uncertainty surrounding regional strategies and, on current form, the IRS will be progressing more or less in tandem with the Core Strategy.

3.8 Reference is made to the Core Strategy being influenced by the Council's own Sustainable Community Strategy and that prepared by North Yorkshire County Council. Two concerns arise from the contents of Para 1.18 in that:

- the Selby Community Strategy runs only to 2010; and
- there is no reference to how the various Community Strategies emerged.

3.9 Clearly, if the Core Strategy is to create the overarching planning framework for the District to 2026, it needs to be informed by a document which extends beyond the immediate period. It would be appropriate for the introductory chapter to set out how and when the SDC/NYCC Community Strategy is likely to be reviewed, its period of operation (2011 – 16 ?) and terms of reference and coverage.

3.10 The second concern arises principally from our view that the Community Strategies referred to tend not to be the subject of formal public scrutiny in preparation or operation.

3.11 Paragraphs 1.19 and 1.20 then outline a number of key issues in relation to "managing finite resources" and "climate change" along with promoting a healthy environment and lifestyle. Whilst there is on-going debate about the science and fact of "climate change", it is important not to lose focus on more localised concerns; for example (fluvial) flooding, mitigation and risk management. This is particularly so as the Draft Core Strategy seeks to focus major development into and around the Selby urban area.

3.12 More over, what seems to be missing from these overarching issues are the "place making agenda" which is at the heart of the spatial planning process (PPS1) and as set out in national policy guidance along with the drivers of securing sustainable economic growth (PPS4) and the provision of affordable homes in places where people want to live (PPS3). Clearly, it is the role of the plan making process to seek an appropriate balance between these issues.



Chapter 2 Key Issues and Challenges

- 3.13 A useful portrait of the District is set out at paragraphs 2.1 to 2.9, although we consider that it would be useful to include a map identifying many of the features listed, including the proximity to major centres such as Leeds and York along with the major transport routes.
- 3.14 What is not clear from the District portrait is a "feel" for how the development of the District economy (as a whole) has developed over the previous 15 or twenty years or a Review of the operation of the current Local Plan policies; some of which are carried forward in to the Core Strategy.
- 3.15 Paragraphs 2.10 to 2.19 reveal a desire to increase the "self-containment" of the District and Selby in particular through a series of interrelated aims - moderating unsustainable travel patterns, concentrating growth into Selby, developing the economy and providing affordable housing. These are all laudable aims, and we are of the view that the Council is seeking to do so in a pragmatic manner. What is of concern in our view is that the Council is seeking to put off a number of decisions to a later date particularly through the Selby Area Action Plan, and it is not clear whether the Core Strategy in its current format will allow this.
- 3.16 Dealing with the individual challenges, there appear to be no subsequent Performance Indicators contained in Figure 8 assessing any reduction in car mileage or commuting patterns (Para 2.11). With the Selby Area Action Plan we understand that the Council is in the process of reviewing the current Local Development Scheme with a view to rationalising the number of documents to be produced – a possible merger of the Allocations and Area Action Plan. This has consequent timetable delays and result in uncertainty.
- 3.17 On the issue of affordable housing (para 2.15) there are innate problems with Housing Needs Assessments which have been debated as part of the preparation of the District Housing Needs and Market Assessment. One simple solution to deliver more affordable housing units is simply to increase the number of houses to be built in the District. Numbers set out in the RSS are minima targets; consequently the Council could merely permit the construction of more dwellings in a year of which 40% could be affordable. For



example if the Council was to permit some 1,000 dwellings per year this could secure delivery of some 2,000 affordable units over the five year period at 400 per year; clearly enough to satisfy the housing needs for the period. This may appear strange but it is clear from the Council's housing trajectory at Figure 5 that the District has experienced annual completion rates upwards of 800 dwellings between 2005 and 2008.

Chapter 3 Vision Aims and Objectives

- 3.18 One of the major concerns we raised to the previous consultation document was the lack of any overarching Vision, or corresponding aims and objectives to frame the subsequent development policies. We are pleased to see that this issue has been addressed through the contents of Chapter 3.
- 3.19 We consider that the Vision at para 3.1 is suitably short and concise. It is appropriate that it is time related ("by 2026").
- 3.20 Turning to the three aims, we consider that these are directly derived from the Vision.
- 3.21 So far as the consequent objectives are concerned, we would take the view that these should be reduced in number or merged where possible. It is not clear whether they are in order of precedence or of equal merit.

Chapter 4 Spatial Development Strategy

- 3.22 A spatial development strategy for the District is to a large extent dictated by the Regional Spatial Strategy which identifies Selby as the Principal town but delegates the designation of Local Service Centres and smaller settlements to the planning authority. There is much material within the evidence base which justifies a clear hierarchy of settlements at the upper tier with Selby followed by Tadcaster and Sherburn performing more localised functions.
- 3.23 Below these three settlements the remainder of the District accommodates 70% of the population. For various reasons the Council has identified the remaining settlements as Service Villages where some growth is allowed and Secondary Villages where some limited infilling may be allowed within Development Limits. Beyond these Limits



development is constrained to replacement and re-use or 100% affordable provision adjoining village limits or other development which may be allowed but only in undefined "exceptional circumstances".

- 3.24 Following the above hierarchical profile, a series of additional "locational" principles are outlined from para. 4.29 through to 4.40. These are a mixture of physical, environmental and policy considerations including, for example: PDL, flood risk, accessibility, environmental and resources and Green Belt /Settlement Character. These all seem relatively straightforward and logical.
- 3.25 Policy CP1 sets out the Spatial Development Strategy and is separated into three components: the location of future development, a sequential approach for the allocation of land and a target for PDL completions. Dealing with these in turn:

Location of Future Development

- 3.26 Overall the upper tier of the hierarchy is predetermined by the RSS. To this end we agree with the designation of Selby as the principal settlement in the District capable of accommodating substantial development along with complementary growth of the adjoining villages.
- 3.27 Tadcaster and Sherburn are supported as Local Service Centres capable of accommodating an appropriate level of growth.
- 3.28 Below this tier the Council has prepared its own evidence in the form of the Background Paper No.6 Village Growth Potential dated February 2010. In this regard we remain confused with regards the status of Ulleskelf; this is one of the few settlements in the District to be served by direct rail services to Leeds and York, the two regional centres.
- 3.29 Material contained in Appendix 1 of the Background Paper identifies Ulleskelf as a secondary village. However, Ulleskelf is excluded from the list of designated Secondary Villages in the list at Appendix 2. There is therefore some confusion to the status of Ulleskelf in the hierarchy. In the previous Preferred Options Selby Council accepted our argument that Ulleskelf is a sustainable location and should be identified as a Primary Village (the equivalent to the Service Village).



- 3.30 Paragraph 4.4 of the Paper suggests that Ulleskelf should be excluded as it fails the PPS25 sequential test as it is "more" vulnerable to flooding. We view this as a subjective appraisal as on this basis most of the Selby Urban Area would be excluded. To our mind the flood risk can be minimised through appropriate mitigation and design.
- 3.31 To this end Ulleskelf should be identified as a Service Village capable of accommodating an appropriate level of development (which would be identified through the subsequent Allocations DPD).
- 3.32 Remaining provisions of CP1 Part A confer a series of principles for scale of development inside and outside of Development Limits and in the Green Belt. Whilst we do not have a particular problem with this approach, we are of the view that strict adherence to the approach set out in the RSS of "no development in the countryside" is too narrow and detrimental to a viable and healthy rural economy.

Allocation of Land

- 3.33 Part B of Policy CP1 suggests that land will be allocated for development based upon a "sequential approach" through an Area Action Plan for Selby (Urban Area) and an Allocations DPD for the remainder of the District. We have two fundamental issues with this part of the policy in terms of the soundness of the approach and the lack of overarching guidelines for the subsequent preparation of any Allocations DPD.
- 3.34 Discussions with the LDF team during the consultation period have raised doubt on the production of the allocations documents with a view to potential merging of the AAP and the Allocations DPD. This may have consequent delays to the programme. Our understanding is that the Council will be revisiting its Local Development Scheme later in 2010. Whilst the simplification of the number and contents of documents is consistent with PPS12 and should be supported, to our mind this introduces an element of doubt and uncertainty about the delivery of development across the District. It would be appropriate for the Council to make a statement to clarify this position.
- 3.35 A more significant concern however, relates to the lack of an overarching framework within Policy CP1 (or for that matter elsewhere in the Core Strategy) with regards to the review, consideration and designation of development limits and a review of the Green



Belt.

- 3.36 To be fair the supporting text at para 4.39 does provide some guidance with regards to "maintaining the overall extent of the Green Belt" and referring to the guidance in RSS and "localised Reviews". No specific guidance however is provided in the RSS of what such a review is and this is not explained or clarified in the Core Strategy text to provide a specific context for Selby District.
- 3.37 Comments regarding Development Limits are similar on the basis that the Core Strategy provides no guidance on how Development Limits will be (re) defined or how the LDF will deal with this particular issue. There is no material within the Evidence Base which suggests how this material will be dealt with. As a result we would query whether this approach is "sound".

PDL Targets

- 3.38 PPS3 identifies a national target that "at least 60%" of new housing should be provided on previously developed land. Clearly this is not achievable in mainly rural District's such as Selby where farmsteads and agricultural buildings do not contribute to brown field supply, and the Council has a proposed policy elsewhere in the Core Strategy against "*garden grabbing*", to prevent the development of garden land – a principal source of "brownfield" land.
- 3.39 There is no similar PDL target set out in the RSS, although there is a preference towards re-use of PDL. To this end, we are concerned with the Council seeking to secure 50% of housing development on PDL in the period to 2017. A positive view is that Selby Council acknowledge that more than 50% of housing coming forward in the first half of the Core Strategy period will be green field development.
- 3.40 Whilst much of the development in the District is to be focussed into the Selby Urban Area, which contains most of the PDL supply, we would question the viability and achievability of the 50% target, be it in the present economic circumstances or otherwise. To achieve this target a significant proportion (almost all) of development coming forward in the Selby Urban Area would need to be on brownfield land. This we would consider a laudable aim, but unlikely to be achievable.



- 3.41 Guidance within PPS3 seeks to ensure that planning authorities' should ensure that a readily available supply of land is available for the 15 year period of the plan, and that there is a rolling 5 year supply of housing land. We would question whether the requirement to maintain a target of 50% will compromise these basic tenets of the plan led system.
- 3.42 We would suggest that the target be amended to secure a target proportion across the Selby Urban Area – i.e. exclude the Local Service Centres and countryside, reduce the target or remove it from the policy altogether along with reference in the justification. Our preference would be for the latter.

Key Diagram

- 3.43 Figure 3 comprises the key diagram for the Core Strategy. We have no particular comments about the figure as presently drafted but would suggest that a contextual plan would be suitable identifying features outside the District.
- 3.44 Likewise we have no comments regarding the Selby Urban Area plan at Figure 4. If the decision is made to merge the Selby AAP and the Allocations DPD, any reference to that AAP should be deleted.

Chapter 5 Creating Sustainable Communities

- 3.45 We have no specific comments upon the introductory paragraphs at 5.1 to 5.3.

Scale and Distribution of Housing

- 3.46 A useful contextual section is contained at 5.4 to 5.26 which explain the Council's rationale towards the strategy for identifying land for housing across the District. Through that section we welcome the Council's approach:
- To recognise that the RSS target of 440 dwellings per annum is a minimum.
 - Not to include an allowance for windfalls in the housing supply
 - Consider the use of completions (including windfalls) to monitor the housing supply position.



- 3.47 With regards to the approach to individual settlements we would take issue with the contents of paragraph 5.12 which states that the Council has “decided” that the most sustainable way of delivering the number of new properties is through two urban extensions to the east and west of Selby. In our view, this approach is too prescriptive and does not provide flexibility should circumstances change. Whilst the evidence and material from the SHLAA and various “Calls for Sites” is available, and the strategic extensions study has been undertaken we remain to be convinced on the Councils’ “decision”. To our mind, the Council should determine the most appropriate strategy for providing housing land through the Site Allocations DPD.
- 3.48 It would be worth referring to the debates into the Harrogate LDF Core Strategy which considered a similar issue; of two strategic urban extensions (“to the east and west of Harrogate and Knaresborough”). Whilst the Inspector supported the Council’s approach regarding the need to identify “areas of search” for two urban extensions, recommendations were proposed to modify the Policy (CS2) to allow the consideration of additional smaller sites. Such a change was proposed to add flexibility and certainty to the Policy.
- 3.49 Contrasting approaches appear to be outlined for the two Local Service Centres - Tadcaster and Sherburn in Elmet. The supporting text at 5.17 indicates that Tadcaster has experienced limited development which, by inference, has been detrimental to the vitality of the town. For Sherburn paragraph 5.16 seems to suggest that the opposite is the case where recent developments appear to have exacerbated the outward commuting patterns. We consider that these broad issues could be explained and set out in the spatial portrait for the District – in Chapter 1.
- 3.50 We welcome the Council’s acknowledgement that there is a need to deliver additional housing growth in Tadcaster to increase the vitality of the town. This acknowledgement is broadly consistent with our views expressed to the Further Preferred Options. At that time the Council were suggesting that, due to the lack of available land, no additional development should take place in the town. Evidence in the Call for Sites and SHLAA clearly demonstrate that this is not the case and that there is an adequate supply of land to accommodate future development requirements.



- 3.51 Paragraph 5.24 indicates that the Council will explore options to secure an appropriate supply of housing land – including the localised Green Belt Reviews. This approach is welcomed although we refer back to our earlier comments.
- 3.52 Policy CP2 sets out the proposed scale and distribution of housing for the District. On the face of it we consider that the proposed indicative requirement represents a pragmatic approach. For Tadcaster the requirement to identify sufficient land for some 530 dwellings is supported, although we would suggest that this should be a **minimum** target in line with guidance within the RSS.
- 3.53 With regard to the remaining provisions of CP2 we would suggest that Provision C is amended to include reference to reviewing the Green Belt boundary around Tadcaster and elsewhere in the District such as Ulleskelf. Appropriate amendments should be made in respect of the references to the Allocations DPD.

Managing Housing Supply

- 3.54 Policy CP3 deals with monitoring the delivery of housing, maintaining a housing land supply, the PDL targets and the action to be taken where there is a shortfall/oversupply against targets.
- 3.55 The text justification suggests that the Annual Monitoring Report will be used as the main tool for measuring progress and provides the trigger whereby policies may change. Para 5.34 suggests that annual targets will be considered for individual settlements or groups of settlements. This would appear prudent in securing a balanced approach to development across the District: however, we consider it may be too prescriptive and overly complicated to enforce. It gives the impression that once a settlement has had its "share", then there will be an embargo on future development. Granting of planning permission is not a guarantee and does not indicate development will progress.
- 3.56 Provision A of Policy CP3 makes reference to monitoring an over- or under-provision in relation to the indicative target. It would be helpful if this provision made reference to the AMR and any indicative parameters wherein the action would be triggered.
- 3.57 In the absence of an Allocations DPD (or similar) then Policy CP3 Provision B suggests



that in the event of a shortfall in supply then reference will be made to the pool of unimplemented "Phase 2" allocations from Policies H2 and H2A. This would appear to be a flawed approach as reference to Tadcaster would suggest that there is only one such allocated site TAD/2 Station Road. At 3.48ha the site is indicated as capable of delivering 105 dwellings.

- 3.58 If Tadcaster is expected to accommodate some 530 or more dwellings over the period to 2026, this would require an annual completion rate of 33 units. This would suggest only a three year supply from allocated sites.
- 3.59 It is not clear what the purpose of Provision C is for and what remedial action can be taken. Given that most PDL arises from employment sites, it will be interesting to understand how the Council will "facilitate" the creation of brownfield sites as suggested in Para 5.39.

Housing Mix

- 3.60 We are pleased to see that the Council has progressed with a Strategic Housing Market Study for the District. Indeed, Carter Jonas attended as part of the working group advising the Council officers. This is a major piece of the evidence base which we criticised the Council for not preparing in time for earlier consultations.
- 3.61 A number of key findings are identified within the justification at paragraphs 5.49 to 5.53 which are driven by both market and demographic factors; these suggest that fewer flats are required and there is a shift towards providing larger family homes and accommodation (especially bungalows) for the elderly. Such findings have implications for the amount of land that may need to be identified given that flats can be provided at a greater density than large homes and bungalows.
- 3.62 Policy CP4 provides the Policy context. As drafted it is appropriate when compared with the alternatives which are too prescriptive and may be difficult to enforce. It is appropriate for house builders, be it private sector or an RSL, to determine the nature and type of housing required (to create sustainable communities) rather than the Council seeking to prescribe a mix.



Affordable Housing

- 3.63 Reference is made to the SHMA in the preparation of the affordable housing policies. The SHMA has identified a certain requirement, recognising that affordability is an issue across the District. However there needs to be recognition that the issue varies across the District and the two principal drivers – availability of property and local income levels - affect the overall position.
- 3.64 We have already suggested one solution to this issue for the Council to enable the construction of up to 1,000 dwellings per annum with a 40% affordable element would deliver the affordable requirement over five years.
- 3.65 Policy CP5 provides the overarching policy framework for affordable housing. Provision A suggests up to a 40% requirement with Provision B suggesting different site size threshold dependent upon settlement size. Overall the policy provides a flexible and adaptive approach to affordable housing. However, we would suggest that the Council seeks a lower threshold of affordable housing across the District.

Rural Housing Exception Sites

- 3.66 Policy CP6 sets out the circumstances where housing can be built in the rural areas for purely affordable housing as an exception to “normal planning policy”. We are opposed to the principles of this policy. In order to create sustainable communities it is not appropriate to seek to restrict housing sites to affordable tenures only. Our representations to the earlier Further Issues and Options suggested that there was no place for such an exceptions policy and that the Council should seek to identify appropriate sites within the smaller settlements capable of accommodating both market and affordable housing to ensure that a balanced housing provision is maintained.
- 3.67 Our view is that the inclusion of an element of market housing in such schemes would ensure that more affordable housing is provided as it can provide some cross subsidy and will contribute to the sustainable community agenda by promoting a mix of tenures in new housing development. On this basis sites are more likely to come forward
- 3.68 It is noted that this is not considered in the Affordable Housing Options which the Council has rejected.



The Travelling Community

- 3.69 No comments are provided at this stage to either the Policy CP7 or the justification narrative; although we retain the right to comment in the future.

Access to Services, Community Facilities and Infrastructure

- 3.70 This proposed policy seeks to deal with physical, community and green infrastructure, making reference to the Community Infrastructure Levy which is enacted from early April.
- 3.71 It is appropriate that Policy CP8 requires that development should provide infrastructure and community facilities required in connection with the development.
- 3.72 National guidance is clear that new development should not be required to address existing deficiencies in the network. A review of the evidence base does not make clear where there are weaknesses and gaps in current infrastructure provision (with the exception of Open Space).
- 3.73 It would be appropriate for the Council to set out its position on the Community Infrastructure Levy given the recent legislation which requires Council's to adopt the CIL process within four years.

Chapter 6 Promoting Economic Prosperity

- 3.74 This chapter sets out the general approach to the economy seeking to focus development into the three main settlements, promoting vital and viable town and village centres and the continued economic diversification of the wider countryside.
- 3.75 In setting out the policy approach reference is made to PPG4; a document dating from the early 1990's which was deleted in December 2009. No reference is made to the various drafts of PPS4 published during the preparation of this Core Strategy document. On the face of it this would appear to be a significant procedural failing, potentially undermining the soundness of the Core Strategy. This is a matter which requires clarification at the earliest stage.
- 3.76 At the heart of the Core Strategy policy is a desire for greater self containment within the



District primarily through measures to curb out commuting to York and Leeds. To some extent this is carried over from the saved policies of the Selby Local Plan, but we would question the merits of this approach. It is not clear whether the policy approach has been monitored to assess its success, and consequently how relevant it is to continue such a policy approach.

- 3.77 Evidentiary material particularly the 2007 Employment Study looks at Selby District as a whole with Selby town providing a hub role as the economic driver of the District. Sherburn is seen as building upon its current strengths (engineering, transport storage and distribution) in a complementary role to Selby. Tadcaster is regarded as having potential as a high value employment location promoting knowledge based activities, given its inherent locational advantage, proximity to the regional drivers (York and Leeds) and position within a high value residential market, the so-called "Golden Triangle".
- 3.78 Recommendations from the report suggest that there should be no loss of existing employment allocations and that within Tadcaster the TAD/3 allocation at 9.0 hectares has the potential to be a high quality business park. It is however, considered to be significantly constrained due to a lengthy allocation /lack of development activity, a need to upgrade water mains and sewers and improvements to the access of the A162.
- 3.79 Additional material within the Retail, Commercial and Leisure Study of 2009 identified a need for start up business space in Selby and Tadcaster town centres, including office clusters and provision of business space in sustainable locations in rural areas.
- 3.80 Overall the studies suggest that (alongside protection of existing sites) an additional 30 hectares of employment land should be identified. This is suggested should be within the 45 ha Olympia Mills site to the east of Selby.
- 3.81 Policy CP9 sets out the broad strategy with nine provisions focussing activity to the east of Selby including the main allocation safeguarding existing and allocated sites whilst encouraging more efficient use of existing sites, and high value knowledge based activity in Tadcaster. (Rural diversification is covered in CP10).
- 3.82 Overall the theme of this Policy CP9 is supported as an aspirational approach to



economic development. However, it is not clear how any subsequent reduction in out commuting will be measured. It is notable that the performance indicators at Figure 8 make reference to reduced outward migration trends by the 2021 Census, although this is grouped with promoting recreation and leisure uses. There seems to be no direct measurement to correlate employment creation with reduced out migration.

Policy CP10 Rural Diversification

- 3.83 Recognition is given to the broad rural nature of much of Selby District and the particular importance of maintain and enhancing a thriving rural economy.
- 3.84 As with the previous section we would advocate that the employment policies be updated to reflect the guidance in PPS4 which has replaced PPG4 along with component parts of PPS7 in relation to economic development.
- 3.85 On a regional level we have criticised the RSS for being a blunt hammer which fails to recognise the potential of the rural parts of the Region and effectively seeking to stymie any development in rural areas. It is up to the various local planning authorities to address the requirements of RSS Policy YH7, to our mind this has been done too inflexibly by a number of local authorities.
- 3.86 Policy CP10 recognises the problem of reducing the need to travel with the reliance in many rural areas upon the private car for most journeys, alongside the need to access employment opportunities. Alongside the support given to rural diversification it would be appropriate for the Core Strategy to support the provision of suitable infrastructure such as the availability of broadband to encourage such diversification.

Policy CP11: Town Centres and Local Services

- 3.87 A number of renaissance studies have been completed which support the improvement of all three of the District's town centres. It is appropriate Policy CP11 builds upon these themes.
- 3.88 Selby is identified as the main town with Sherburn and Tadcaster considered to serve more localised services. It should be noted that Tadcaster serves a catchment beyond the immediate District boundary serving adjoining parts of Harrogate, Leeds and York



Districts; a more diverse catchment than indicated at Para 6.42. The broad hierarchy is considered suitable and that the spatial vision provided through CP11 is appropriate.

- 3.89 An intention is stated to update the relevant development management policies in the saved Selby Local Plan through a Development Management DPD and Allocations DPD. It would be helpful if the role of these documents could be clarified.
- 3.90 Provision B(b) should make reference to the sequential "approach".

Chapter 7 Improving the Quality of Life

- 3.91 Central to the role of the spatial planning process in Selby District is the quality of life of residents, in terms of the natural and built environment and also in promoting the health and well being of existing communities. This particular chapter contains a toolbox of strategic policies which promote sustainable patterns of development and principles.
- 3.92 Within the justification is a review of the prevailing dogma regarding "climate change" as well as consideration of particular issues facing the District including, inter alia, management of flood risk, water quality protection and resource efficiency.
- 3.93 We are concerned with the introductory section of this chapter which appears to confuse "climate change" with "sustainable development". As a starting point it is necessary for the justification to distinguish between the contents of PPS1 "Sustainable Development" and the contents of the PPS1 Supplement on Climate Change. Within the introductory paragraphs there is also selective use and quotation of the Energy White Paper. For example, it refers to "energy security" and focuses upon this, but fails to make reference to the other three strands of reducing fuel poverty, diversity of supply and energy efficiency.
- 3.94 There needs to be a clarification in the text between what are international and local issues. Another aspect is the need to separate adaptation and mitigation; PPS1 provides a definition for each. Paragraph 9 of the PPS Supplement also provides guidance on what should be contained in LDF Core Strategy policies.



Policy CP12

- 3.95 We have fundamental problems with this policy.
- 3.96 Clearly spatial planning has a central role in promoting sustainable patterns of development and it is important that the Core Strategy deals with these issues. The provisions set out in this policy provide an overarching framework to the principles of sustainable development consistent with the broad matters established in PPS1.
- 3.97 It is important however, that the Core Strategy sets these matters out as they reflect the needs of the District. We would suggest that the title of the policy should refer to "promoting sustainable patterns of development" and that this is included in the text.
- 3.98 Parts of this policy are generic, have no local flavour and merely replicate national guidance. To some extent it is not clear whether the policy should be earlier within the text to demonstrate key principles, rather than tagged on at the end, or deleted altogether. It repeats a number of the key locational principles (para 4.29 onwards) which are also listed as objectives (para 3.5). A number of matters are listed and then duplicated in subsequent policies whereas some matters are not taken further at all.
- 3.99 In terms of the latter some reference is made to green infrastructure, although grey infrastructure (roads, rail, utilities, drainage, and water supply) and blue infrastructure (rivers groundwater etc) appear to be given limited coverage.
- 3.100 In line with our comments (at 3.97) above it would be appropriate (if retained) for the policy to cross refer to an efficient transport system, transport improvement, demand management along with making broader reference to utilities, the water quality framework directive, etc.

CP13 Improving Resource Efficiency

- 3.101 Provisions within this policy are generally robust and suitable for a Core Strategy when read together with Policy CP14.
- 3.102 A major concern with this policy is within Provision B which effectively suggests that more than half of the total energy needs for major development and strategic sites should be



derived from a number of sources which are principally heat generators. This policy falls where the development does not require heat generation or carries a zero heat load, and fails to account for the general position that only 40% of the energy requirements of buildings relate to heat generation. We consider that in its present form this policy is not operable and effectively makes many developments unviable.

CP14 Renewable Energy

- 3.103 Within this policy we are concerned with the approach which assumes that renewable energy generation will cause harm.
- 3.104 Careful consideration also needs to be given to Provision B and how it fits with the recently published Permitted Development Rights for domestic micro generation and the proposals for similar guidance for business premises.

CP15 Protecting and Enhancing the Environment

- 3.105 Selby District has a number of natural and built resources of landscape, historic, natural and wildlife/habitat value. It is right for these features to be protected and enhanced.
- 3.106 In moving forward with this policy it would be appropriate to consider the contents of the recently published PPS5 on the Heritage Resource which seeks an integrated approach removing the distinction between buildings, archaeological resource and the landscape.

CP16 Design Quality

- 3.107 It is appropriate to have a policy of this nature which seeks to promote high quality design and to ensure that new development is appropriate to its context.
- 3.108 Elements of this policy appear to duplicate (or be duplicated by) policy CP12.



4.0 SUMMARY AND CONCLUSIONS

- 4.1 Carter Jonas LLP acts on behalf of The Grimston Park Estate which is a major landowner in the north of the District with property and development interests, principally around the settlements of Tadcaster, Ulleskelf and Towton.
- 4.2 Representations were submitted to the previous incarnation of this document suggesting that it was below par and did not satisfy the minimum requirements set out in PPS12. Particularly absent was a vision for the Core Strategy, and a set of corresponding aims and objectives to set the framework for the subsequent spatial a strategy and policies.
- 4.3 This current document is a clear improvement and Council officers are to be commended for a well structured and thorough document. There are a number of areas where the introductory section could be improved in particular to describing and explaining relationships to adjoining areas through appropriate maps and narrative. Also it would be useful for the spatial portrait to describe the different parts of the District, from a District wide perspective.
- 4.4 A spatial framework in CP1 sets out an appropriate hierarchy, although we would question the Council's consideration of Ulleskelf as a secondary village given the direct rail access to both York and Leeds. Tadcaster is appropriately identified as a second tier Local Service Centre capable of accommodating development which will support the regeneration and viability of the town.
- 4.5 Identification of specific sites and locations for development is deferred to subsequent Development Plan Documents, although there is some uncertainty as to the future progress of these documents with a proposed revision to the Local Development Scheme. Selby Council should remove uncertainty and clarify this matter as quickly as possible.
- 4.6 We consider that a major failing of the CP1 is that it does not provide a framework for the review of development limits or the Green Belt
- 4.7 With regards to the various policies, it is welcomed that the Council has suggested that Tadcaster should accommodate around 530 dwellings over the plan period. The



uncertainty surrounding the subsequent DPD's raises concerns about ensuring the availability of a five year supply of deliverable housing land across the District.

- 4.8 Carter Jonas LLP is involved in the preparation of parts of the evidence base in particular the SHLAA and the SHMA. In this regard we welcome the Council's recognition to focus upon the provision of family homes and other accommodation, rather than concentrating more flats in high density developments. There needs to be recognition by the Council regarding the consequences upon the need to identify sufficient land to accommodate this development.
- 4.9 Likewise we have raised concerns regarding the Council's targets for Previously Developed Land against a background of seeking to stop development in back gardens and that the primary source of brownfield land is from employment uses.
- 4.10 Policies on economic development again focus development into the three principal settlements and support rural diversification. However, the document does not have regard to PPS4 which was published prior to this public consultation. In supporting economic diversification the Core Strategy does not mention or support provision of the appropriate infrastructure such as high speed broad band.
- 4.11 In terms of the Quality of Life policies at Chapter 7 we have specific concerns regarding the Council's interpretation of PPS1 and the Supplement on Climate Change. Policy CP12 appears largely generic merely repeating national guidance and duplicating other policy and content within the Core Strategy. It could be deleted.
- 4.12 Minor clarifications and changes are suggested to the subsequent policies on resource efficiency and renewable energy. Policies on design and the broader environment should have regard to the newly published PPS5.
- 4.13 Carter Jonas welcomes the opportunity to provide further representations, and we hope that these comments are viewed positively in progressing the Core Strategy towards adoption. We are happy to provide further explanation and clarification of the matters raised in these representations if this is necessary.

Comments ID DCS/55
Consultee ID 416036

ryan king

From: Rachael Thorne [rthorne@peel.co.uk]
Sent: 31 March 2010 09:43
To: ldf
Cc: Robert Watson
Subject: Selby District Consultation Draft Core Strategy - Comments
Attachments: Selby District Consultation Draft Core Strategy - Comments.doc

Dear Sir / Madam,

Please find attached completed comments form in response to the Selby District Consultation Draft Core Strategy on behalf of Peel Environmental Ltd.

I trust the attached will be considered as part of the plan process.

Regards

Rachael Thorne
Graduate Planner

Peel Holdings (Environmental) Limited
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Telephone: 0161 629 8436 **Fax:** 0161 629 8335
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31/03/2010



**Comments Form
Consultation Draft Core Strategy
for Selby District
February 2010**

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Find out more and Let us Know your Views.....

Consultation on the Draft Core Strategy begins on Thursday 18 February 2010 and comments should be submitted by **1 April 2010**.

Details of consultation events are available through the Council's Citizenlink newspaper, the local press, and our website www.selby.gov.uk.

Copies of the accompanying evidence base including the Sustainability Appraisal Report and Background Papers can also be viewed on our website or at Access Selby, contact centres in Sherburn in Elmet and Tadcaster and local libraries in the District.

You can now submit your comments directly online and we will keep you informed about future stages of the LDF. Please go to our dedicated consultation website for the LDF at <http://selby-consult.limehouse.co.uk> to register your details and submit comments.

Alternatively you can complete a comments form (like this one) which is available from the Core Strategy pages of our website www.selby.gov.uk and e-mail to ldf@selby.gov.uk. Comments forms are also available from the 'consultation points' referred to above and may be posted to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby YO8 4SB. Faxed comments, using this form should be sent to (01757) 292090.

Please submit your comments by 5pm on Thursday 1 April 2010

Please provide your contact details below. *We do not accept anonymous comments.*

a) Personal details		a) Agent details if you are using one	
Name	Rachael Thorne	Name	
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Please tell us on which part of the document you are commenting:

Section Number / Paragraph(s) / Policy Number

Section 6 - Policy CP9 viii

Do you agree with this text / policy? Yes / No / Partly

Please add any comments below

What is wrong with it? How should it be changed? Does anything need adding?

Peel Environmental Ltd agrees with the comments made within the Selby District Consultation Draft Core Strategy regarding the former Gascoigne Wood surface mine in Policy CP9 (viii). We agree that support should be given to the development of activities linked to the existing rail infrastructure at this site, in order to develop and revitalise the local economy. As such, Peel Environmental Ltd would like to put forward to the Selby District Core Strategy that an appropriate use of this site would be a rail served renewable energy use. Such a use would utilise the existing rail infrastructure as specified in Policy CP9 and would provide opportunities to revitalise the local economy. This site would also be suitable for a renewable energy use due to it having a major grid connection of 50MW. It is proposed that reference to this use be included within Policy CP9 (viii) and supporting text of the Core Strategy, as an appropriate activity or use for this site.

Please copy / print extra sheets and use a new sheet for each section / policy

Please tell us on which part of the document you are commenting:

Section Number / Paragraph(s) / Policy Number

Section 6 - Paragraph 6.21

Do you agree with this text / policy? Yes / No / Partly

Please add any comments below

What is wrong with it? How should it be changed? Does anything need adding?

Whilst Peel Environmental Ltd agrees that The Council should support the reuse of buildings at the former Gascoigne Wood mine (provided this is directly linked to the use of the existing rail infrastructure), it is suggested that this should not prevent the reuse of the site as a whole for employment uses.

Perhaps more appropriate wording would be; 'The Council also supports the redevelopment of the former Gascoigne Wood mine including the reuse of buildings, where appropriate, provided this is directly linked to the use of the existing rail infrastructure that exists at the site.'

Please copy / print extra sheets and use a new sheet for each section / policy

Please add any further comments you may have about the Draft Core Strategy including:

- Any omissions
- The Background Papers / Reports
- The Sustainability Appraisal

Please sign and date the form

Signed R. Thorne

Date 31.03.2010

If you have any questions or need some further information please contact the Local Development Framework Team on 01757 292034 or by email to ldf@selby.gov.uk.

Please return this form **no later than 17.00hrs (5pm) on Thursday 1 April 2010** to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB

Please answer a few more questions on the attached sheet which will help us to improve the way we consult in the future

ryan king

From: JAMES DEANS [REDACTED]
Sent: 31 March 2010 11:56
To: ldf
Subject: LDF CORE STRATEGY CONSULTATION COMMENTS
Attachments: 100218_Core_Strategy#1E837D.pdf



100218_Core_Strategy#1E837D.pdf...

Please find attached, the completed comments form from Kelfield Parish Council.

Yours sincerely,

J T Deans

Clerk and Responsible Financial Officer Kelfield Parish Council

65 Mount Park
Riccall
York
YO19 6QU

Tel: [REDACTED]
email: [REDACTED]



**Comments Form
 Consultation Draft Core Strategy
 for Selby District
 February 2010**



Office use
 ID No:

Find out more and Let us Know your Views.....

Consultation on the Draft Core Strategy begins on Thursday 18 February 2010 and comments should be submitted by **1 April 2010**.

Details of consultation events are available through the Council's Citizenlink newspaper, the local press, and our website www.selby.gov.uk.

Copies of the accompanying evidence base including the Sustainability Appraisal Report and Background Papers can also be viewed on our website or at Access Selby, contact centres in Sherburn in Elmet and Tadcaster and local libraries in the District.

You can now submit your comments directly online and we will keep you informed about future stages of the LDF. Please go to our dedicated consultation website for the LDF at <http://selby-consult.limehouse.co.uk> to register your details and submit comments.

Alternatively you can complete a comments form (like this one) which is available from the Core Strategy pages of our website www.selby.gov.uk and e-mail to ldf@selby.gov.uk. Comments forms are also available from the 'consultation points' referred to above and may be posted to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby YO8 4SB. Faxed comments, using this form should be sent to (01757) 292090.

Please submit your comments by 5pm on Thursday 1 April 2010

Please provide your contact details below. *We do not accept anonymous comments.*

a) Personal details		a) Agent details if you are using one	
Name	J T Deans	Name	
Organisation	Kelfield Parish Council	Organisation	
Address	65 Mount Park Riccall York	Address	
Postcode	YO19 6QU	Postcode	
Tel	[REDACTED]	Tel	
Fax		Fax	
Email	[REDACTED]	Email	

Please tell us on which part of the document you are commenting:

Section Number / Paragraph(s) / Policy Number 4.27 Secondary Villages

Do you agree with this text / policy? No

Please add any comments below

What is wrong with it? How should it be changed? Does anything need adding?

It is the Parish Council's opinion that the restrictions on development within Secondary Villages is likely to strangle progress in terms of turnover of population, influx of new blood and development of facilities.

The Council is also unsure of the meaning the District Council interprets as *local need* when it refers to affordable housing schemes being considered favourably outside the village limits.

Does it mean demand from within the village/parish?

Could it be interpreted as demand from neighbouring villages?

Might it be extended if expedient to those in power at the time to interpret local as the Selby District?

These are genuine questions which require well defined answers.

Kelfield Parish Council approves of the overall strategy of the document in general, but raises its concerns regarding the above.

Please copy / print extra sheets and use a new sheet for each section / policy

Please tell us on which part of the document you are commenting:

Section Number / Paragraph(s) / Policy Number

Do you agree with this text / policy? Yes / No / Partly

Please add any comments below

What is wrong with it? How should it be changed? Does anything need adding?

(This area is intentionally left blank for providing comments.)

Please copy / print extra sheets and use a new sheet for each section / policy

Please add any further comments you may have about the Draft Core Strategy including:

- **Any omissions**
- **The Background Papers / Reports**
- **The Sustainability Appraisal**

Please sign and date the form

Signed J T Deans
Clerk and Responsible Financial Officer
Kelfield Parish Council

Date 31/3/2010

**Please answer a few more questions on the attached sheet
which will help us to improve the way we consult in the future**

ryan king

From: Julie White [Julie.White@dpplp.com]
Sent: 31 March 2010 11:23
To: ldf
Cc: Edward Uwechue
Subject: Core Strategy Representations
Attachments: 100218_Core_Strategy_Final_Comments_Form_DPP.pdf

Please find attached our representation.

Kind regards,
Julie White (julie.white@dpplp.com)
Senior Planner
DPP

Apsley House
78 Wellington Street
Leeds
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**Comments Form
Consultation Draft Core Strategy
for Selby District
February 2010**

LDF LOCAL
DEVELOPMENT
FRAMEWORK

Office use
ID No:

Find out more and Let us Know your Views.....

Consultation on the Draft Core Strategy begins on Thursday 18 February 2010 and comments should be submitted by **1 April 2010**.

Details of consultation events are available through the Council's Citizenlink newspaper, the local press, and our website www.selby.gov.uk.

Copies of the accompanying evidence base including the Sustainability Appraisal Report and Background Papers can also be viewed on our website or at Access Selby, contact centres in Sherburn in Elmet and Tadcaster and local libraries in the District.

You can now submit your comments directly online and we will keep you informed about future stages of the LDF. Please go to our dedicated consultation website for the LDF at <http://selby-consult.limehouse.co.uk> to register your details and submit comments.

Alternatively you can complete a comments form (like this one) which is available from the Core Strategy pages of our website www.selby.gov.uk and e-mail to ldf@selby.gov.uk. Comments forms are also available from the 'consultation points' referred to above and may be posted to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby YO8 4SB. Faxed comments, using this form should be sent to (01757) 292090.

Please submit your comments by 5pm on Thursday 1 April 2010

Please provide your contact details below. We do not accept anonymous comments.

a) Personal details		a) Agent details if you are using one	
Name		Name	Edward Uwechue
Organisation		Organisation	DPP LLP
Address		Address	Apsley House, 78 Wellington Street, Leeds, West Yorkshire
Postcode		Postcode	LS1 2EQ
Tel		Tel	0113 243 8399
Fax		Fax	
Email		Email	Edward.uwechue@dppllp.com

Please tell us on which part of the document you are commenting:

Section Number / Paragraph(s) / Policy Number

CP11

Do you agree with this text / policy? Yes

Please add any comments below

What is wrong with it? How should it be changed? Does anything need adding?

We support the main objectives of proposed Policy CP11. It is considered that the proposed policy will encourage economic growth in Selby and would help maintain the vitality and viability of the Town Centre.

Selby Town Centre should remain the main focus for convenience and comparison goods retailing, as the district's Principal Town. In addition, we welcome that the proposed policy seeks to strengthen the role of Local Service Centres by encouraging a wider range of retail and service uses, which meet the needs of the area served by the centre and that would not have a detrimental affect on the vitality and viability of Selby.

Please copy / print extra sheets and use a new sheet for each section / policy

Please tell us on which part of the document you are commenting:

Section Number / Paragraph(s) / Policy Number

Para. 4.6 to 4.13

Do you agree with this text / policy? Yes

Please add any comments below

What is wrong with it? How should it be changed? Does anything need adding?

We support the proposed settlement hierarchy outlined in paragraph 4.13 and supporting paragraphs.

We consider that the main focus for retail and commercial growth is within Selby's urban area, whilst limited growth appropriate in scale will be allowed in other centres within the settlement hierarchy. The proposed settlement hierarchy will help create sustainable patterns of economic growth.

Please copy / print extra sheets and use a new sheet for each section / policy

Please add any further comments you may have about the Draft Core Strategy including:

- **Any omissions**
- **The Background Papers / Reports**
- **The Sustainability Appraisal**

Paragraph 6.34 onwards makes reference to PPS6 being the main national policy consideration; and this document will be replaced by PPS4. We note and PPS4 was formally adopted on the 29th December 2009. Therefore, references to PPS6 should be deleted and the appropriate paragraphs amended to take into account policies within PPS4.

Please sign and date the form

Signed _____

Date _____

If you have any questions or need some further information please contact the
Local Development Framework Team on 01757 292034 or by email to ldf@selby.gov.uk.

Please return this form **no later than 17.00hrs (5pm) on Thursday 1 April 2010**
to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road,
Selby, North Yorkshire, YO8 4SB

**Please answer a few more questions on the attached sheet
which will help us to improve the way we consult in the future**

Comment ID DES/79
Consultee ID 416372
Agent ID 416368

ryan king

From: Leeming, Paul [Paul.Leeming@carterjonas.co.uk]
Sent: 31 March 2010 12:14
To: ldf
Subject: Selby LDF - Core Strategy Consutation Draft - Represetation on behalf of Mr & Mrs M Waddington
Attachments: Microsoft Word - 17075 310310 M Waddington Selby Core Strategy Reps.pdf

Dear Mr Heselton

Please find attached representations to the draft Core Strategy on behalf of Mr & Mrs M Waddington who have land and property interests in Barlby and Selby. I would be grateful for acknowledgement of receipt.

If you have any queries please do not hesitate to contact me.

Yours sincerely

Paul Leeming MRTPI
Associate

For and on behalf of Carter Jonas LLP
T: 01423 707804
M: 07976 381195



Carter Jonas LLP
Regent House
13-15 Albert Street
Harrogate HG1 1JX



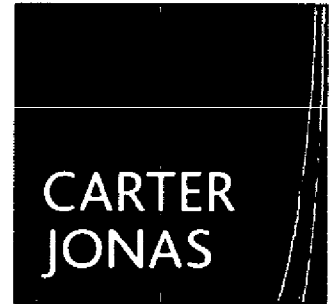
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Carter Jonas LLP
Place of Registration: England and Wales
Registration Number: OC304417
Address of Registered Office: 127 Mount Street, Mayfair, London. W1K 3NT

31/03/2010

Our Ref: PAL/16198 Barlby
Your Ref:



The Property People

Regent House
13-15 Albert Street
Harrogate, HG1 1JX

LDF Team
Development Policy
Selby District Council
Civic Centre
Portholme Road
Selby YO8 4SB

Dear Mr Heselton

SELBY LDF CONSULTATION DRAFT CORE STRATEGY – PUBLIC CONSULTATION

Introduction

Carter Jonas LLP represents Mr & Mrs M Waddington with regard to their land and property interests within the District. Currently their portfolio includes a number of holdings of agricultural land, commercial and retail premises within Barlby/Barlby Bridge and Selby town.

Representations were submitted on their behalf to the Further Options version of the Core Strategy in December 2008. Our key points focussed upon the Council's housing aspirations and included:

- Support for recognition of the role of Barlby as part of the principal urban area;
- Concerns over the ability of Selby to accommodate development in urban extensions alone;
- Support for rounding off and infill development opportunities; and
- The Council should undertake a review of land affected by local landscape designations with a view to delivering the most sustainable housing sites across the District.

Land at Barlby has been submitted through the Call for Sites to the Strategic Housing Land Availability Assessment (SHLAA) and is the principal focus for these representations.

Representations

In responding to the Consultation Draft Core Strategy, the Council officers should be commended for producing a generally thorough Core Strategy document which is a significant improvement upon the previous Further Issues and Options document. A lot of effort has gone into preparation of the document and the associated evidence base.

Support is given to the overall **vision** for the District which is pleasantly brief, although we would question the number of **objectives** which are outlined.

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Reg office 127 Mount Street, London W1K 3NT

Policy CP1 sets out the overall Spatial Development Strategy for the District with Part A recognising Selby as the principal centre in the District, with Barlby (and Osgodby) as a Service Village where there is scope for additional residential and employment development to complement growth in Selby (town).

Part B suggests that land will be allocated through an Area Action Plan for Selby to include Barlby, and an Allocations DPD. Discussions with officers have thrown in to doubt this process suggesting that the Council will be reviewing its Local Development Scheme later in the year. We are concerned that this may result in delays and uncertainty in bringing development sites forward and would be grateful for clarification and certainty on this matter as a matter of course.

A sequential approach is set out which we consider to be appropriate giving first priority to Previously Developed Land. Part C sets out an indicative target for PDL across the District. We consider that it may be appropriate to set an indicative target for the Selby Urban Area (possibly to be covered by the AAP), but that this is inappropriate across the wider rural District where brownfield opportunities are scarce. It is welcomed that the Council accepts that there will be a need to release greenfield sites to accommodate the (RSS) housing requirement.

There appears to be a lack of an overarching policy framework which prioritises how the Council will deliver the RSS targets across the District (see subsequent comments upon **Policy CP12**).

Figure 4 demonstrates the extent of the Selby Urban Area, where most of the District's housing and employment development will be focussed. This is considered to be an appropriate definition of the broader Selby urban area.

Policy CP2 sets out the scale and distribution of housing across the District suggesting that some 57% of new dwellings should be provided in the Selby area including Barlby. It recognises that new allocations will need to be made for some 2,864 dwellings within the urban area.

Part B suggests that the majority of this provision (1,800) will be provided on two urban extensions to the west and east of Selby, whilst some 1,100 will be provided on a number of smaller sites including at Barlby. We are generally supportive of this approach, but consider that the identification of actual numbers within the extensions may be too prescriptive.

Policy CP3 sets out a method of managing housing land supply through the housing trajectory and controlling the release of land through the Annual Monitoring Report. We consider that in principle this is an acceptable approach but would remind the Council that the RSS targets are minima, and can be exceeded. We would suggest that one way of the Council meeting its affordable housing targets is to simply permit the construction of more housing.

A number of reports have been completed in the last year including a Strategic Housing Land Assessment and A Strategic Housing Market Assessment. Carter Jonas LLP took part in the process as part of the Council's working group. The summary findings of the SHMA are set out

at Para 5.51, which suggest that more larger/family housing and bungalows are required and there is no need for smaller (1 bedroom) properties or flats.

There are consequences to this in terms of the amount of land which the Council may need to identify to accommodate larger residential properties. For instance the Olympia site extend to 45 hectares of which the Council suggests 15 ha (or so) will be available for housing. A suggested yield of 800 dwellings implies a density of over 53 dwellings (gross) per hectare. We would question whether this is achievable. With regards to the 1,100 dwellings to be found on smaller sites around the Selby urban area, a general density of 30-35 dwellings per hectare would suggest between 31 and 36 ha of land will need to be identified.

In order to achieve this, the Council will need to find a number of sites and undertake a review of Development Limits. However, the Core Strategy does not give any clear guidance on what matters will be taken into account for reviewing development limits.

Policy CP4 suggests housing mix on development sites will be informed by the (most recent) SHMA and housing needs surveys. This is a flexible approach compared with the prescriptive alternatives. An important consideration is also the commercial view of housing providers both private sector and the RSL's in what is viable upon a site. The policy should be amended to include such consideration.

Affordable housing requirements are set out in **Policy CP5** wherein the Council suggests a target of (up to) 40% across the District, with individual sites and proposals subject to viability testing. We support the proposal for a regular review of the economic viability considerations.

Policy CP8 requires that the infrastructure and community facilities and services required in connection with new development should be provided either on site, off-site or through financial contribution. Para 5.122 suggest that within Selby this will be addressed through a separate Infrastructure Delivery Plan. With the uncertainty surrounding the proposed AAP it would be appropriate for the Council to clarify this position.

Measures to improve and enhance the viability and vitality of Selby as the commercial focus of the District in **CP9** and **CP11** is generally supported.

Policies within Chapter 7 deal with "Quality of Life" covering resource efficiency, renewable energy protecting and enhancing the natural and built environment and design quality in new development. The generality of the proposed policies **CP13**, **CP14**, **CP15** and **CP16** is supported.

There are significant concerns with **Policy CP12** which reflect upon a concern with the document as a whole; there appears to be no specific policy or overarching strategy which sets out the principles of development and site selection /allocation for development.

Policy CP12 deals with "climate change". We would suggest that this is a misnomer as the provisions within the policy relate to the principles of sustainable development. As worded the

policy is too generic, simply repeating national policy without specific reference to the locality and characteristics of Selby District contrary to the guidance in PPS12. We would suggest the policy as worded be deleted. It should be replaced by an overarching policy which sets out the primary issues within the District.

Conclusions

Carter Jonas LLP welcomes the current version of the Core Strategy in Consultation Draft form. It is considered to be superior to the previous version of the document and officers should be commended for the amount of effort put in.

Broadly we are supportive of the overarching strategy which seeks to promote Selby and the surrounding area for development. However we do have a number of concerns and consider that the Council could improve the document and remove areas of uncertainty.

In broad terms these include:

- Clarification of the role of the Selby AAP and component documents – the Council is considering rationalising the documents;
- Simplifying the number of objectives;
- Providing an overarching spatial policy (along with amendment /deletion of Policy CP12).
- Provision of guidance on the review of development limits and local landscape designations
- Less prescriptive housing requirements for the Selby Urban extensions.

There are a number of typographic errors which we would assume will be dealt with as a matter of course as the Core Strategy progresses towards adoption.

If you have any queries regarding the contents of these representations please do not hesitate to contact me.

Yours sincerely

Paul Leeming BA(Hons) BTP MRTPI
Associate
For and on behalf of Carter Jonas LLP

Email: paul.leeming@carterjonas.co.uk
DD: 01423 707604

ryan king

From: Matthew.Naylor@yorkshirewater.co.uk
Sent: 31 March 2010 14:02
To: idf
Subject: Core Strategy

Attachments: Selby District Core Strategy Feb2010.doc; Selby District Core Strategy Feb2010 letter.pdf



Selby District Core Strategy F... Selby District Core Strategy F...

Dear LDF Team,

Please find attached Yorkshire Water's response to the above consultation.

If you have any questions please let me know.

Thanks,
Matt

(See attached file: Selby District Core Strategy Feb2010.doc) (See attached file: Selby District Core Strategy Feb2010 letter.pdf)

Find out how our new character Numptee is causing all sorts of problems by putting the wrong things down his toilet and drains - check out his videos and look at what you can do to help keep your drains running free.

Visit <http://www.yorkshirewater.com/binit>

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YorkshireWater

LDF Team
Development Policy
Selby District Council
Civic Centre
Portholme Road
Selby
YO8 4SB

Land, Property and Planning
Yorkshire Water
Western House
Halifax Road
Bradford
BD6 2LZ

T 01274 692916
F 01274 692643
E Matthew.Naylor@yorkshirewater.co.uk

31st March 2010

Dear LDF Team,

RE: Selby District Consultation Draft Core Strategy February 2010

Thank you for consulting Yorkshire Water on the above consultation document.

Please find attached our response to the various policies and options proposed.

If you have any queries please do not hesitate to contact me.

Yours Sincerely,

Matthew Naylor
Development Planner



Selby District Consultation Draft Core Strategy February 2010

3. Vision, Aims and Objectives

Yorkshire Water supports the vision, aims and objectives identified in this chapter. In particular we support objectives 6 and 16.

4. Spatial Development Strategy

Yorkshire Water supports the settlement hierarchy and the methodology in the Village Growth Potential background document. The aim to direct development to previously developed land in the more urban areas is much more likely to benefit from existing infrastructure.

Policy CP1 - Yorkshire Water supports this policy and the aim to direct development to areas with infrastructure capacity and avoid areas with existing constraints on the local infrastructure.

5. Creating Sustainable Communities

It would be beneficial to have more details on the proposed strategic sites within the Core Strategy, particularly given they will account for two thirds of the total housing requirement. For example, key diagram showing the location of the two strategic sites, their proposed phasing and what is needed to ensure the sites can take place in a sustainable manner.

Policy CP2 – is there a further breakdown of the housing requirements for each settlement group? For example, will the 1265 new allocations in designated service villages be split equally, or will some villages receive more? This is essential information to ensure the necessary infrastructure can be put in place to meet the demands of new development.

Para 5.37 – we support the requirement that a site must have the necessary infrastructure to enable delivery if it is brought forward from its original phase and into the five year supply.

Policy CP3 – Yorkshire Water has made provision for those sites allocated in the Local Plan in our next five year investment programme. Therefore there will be sufficient capacity to accommodate these sites.

Policy CP6 – Yorkshire Water supports this policy that ensures affordable rural exception sites still have to be in accordance with normal development management criteria.

Improving the Quality of Life

Para 7.13 – The first sentence in this paragraph should be amended to read “Climate change may put pressure on water resources”. There is a great deal of uncertainty over climate change and this statement should reflect that fact. Please see our Water Resources Plan for further details at: <http://www.yorkshirewater.com/our-environment/water-resources/managing-water-resources.aspx>

Policy CP12 – Yorkshire Water supports this policy, however it would benefit from some further details. Part g encourages the use of sustainable drainage systems, an additional point to part g, or it may be better as a separate part to this policy, would be to ensure a 30% reduction in surface water discharges from existing brownfield sites. This is a policy supported by both the Environment Agency and Yorkshire Water.

Policy CP13 – Yorkshire Water supports part C of this development.

Policy CP15 – Yorkshire Water supports this policy, in particular part 6 which aims to protect water resources from pollution. This is particularly important in parts of Selby due to the presence of

groundwater used to resource the public water supply. These are protected by the Environment Agency's Source Protection Zones. These are split into three zones:

Zone 1 (Inner protection zone)

Any pollution that can travel to the borehole within 50 days from any point within the zone is classified as being inside zone 1. This applies at and below the water table. This zone also has a minimum 50 metre protection radius around the borehole. These criteria are designed to protect against the transmission of toxic chemicals and water-borne disease.

Zone 2 (Outer protection zone)

The outer zone covers pollution that takes up to 400 days to travel to the borehole, or 25% of the total catchment area – whichever area is the biggest. This travel time is the minimum amount of time that we think pollutants need to be diluted, reduced in strength or delayed by the time they reach the borehole.

Zone 3 (Total catchment)

The total catchment is the total area needed to support removal of water from the borehole, and to support any discharge from the borehole.

ryan king

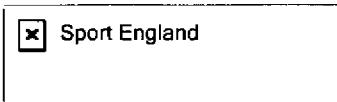
From: Helen Ledger [Helen.Ledger@sportengland.org]
Sent: 31 March 2010 16:27
To: ldf
Cc: Lauren Brown; Joy Flanagan
Subject: Sport England's response the draft core strategy consultation
Attachments: 31032010 Selby Draft Core Strategy consultation Sport England response.doc

Please find Sport England's response attached.

Many thanks,

Helen Ledger
Planning Manager

T: 020 7273 1619
M: 07785345277
F: 0113 242 2189
E: helen.ledger@sportengland.org



Creating sporting opportunities in every community

Sport England, 4th Floor Minerva House, East Parade, Leeds, LS1 5PS.

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Creating sporting opportunities in every community

Terry Hestleton
Principal Planner (LDF Team)
LEDF Team
Selby District Council
Civic Centre
Portholme Road
Selby
North Yorkshire
YO8 4SB

31 March 2010

Dear Sir,

Selby Local Development Framework – Consultation on Draft Core Strategy

Thank you for consulting Sport England on your emerging Core Strategy. It is understood the document has had various reiterations most recently in Autumn/Winter 2008. Sport England has record of making comments in December 2008 on issues such as community infrastructure, evidence base and strategic housing.

The comments and information I have provided below are intended to be constructive and of assistance during the preparation of the Submission document. There are two "self-assessment" checklists included to help you ensure a robust evidence base is in place and that all issues relating to sport and active recreation have been strategically considered.

I have divided my comments into three sections:

- Sport England aspirations for sport and active recreation
- General comments on the approach and evidence base of the Core Strategy
- Specific comments on the content of the Core Strategy

Sport England aspirations for sport and active recreation

Sport England is committed to the spirit and purpose of spatial planning. The integration of policies for the development and use of land with other policies and programmes chimes with the potential of sport and active recreation to make a contribution across a range of policy areas. Through partnership



working, Sport England seeks to engage with planners at regional and local levels to help ensure that the interests of sport and active recreation are well represented, actively promoted and appropriately developed in the interests of all.

By working with planners at regional, sub-regional and local scales, Sport England wishes to develop a practical approach to planning for sport and active recreation and to this end seeks involvement in plan and policy development at regional, sub-regional and local scales. This means seeking opportunities for promoting the interests of sport and active recreation through a variety of means, including statutory and non-statutory mechanisms, at a variety of scales, delivered through top-down and bottom-up mechanisms. The advent of the spatial planning system offers such opportunities, particularly developing new partnerships in realising a wider agenda than pursued hitherto. Here the contribution of sport and active recreation to agendas associated with regeneration, health promotion and environmental enhancement, for instance. The following principles will inform how Sport England seeks to engage with the planning system in the promotion of the interests of sport and active recreation.

- Environmental sustainability
- Community safety
- Local economic viability
- Improving quality of life and well-being
- Health improvement
- Raising standards in schools

http://www.sportengland.org/facilities_planning/developing_policies_for_sport.aspx

General comments on the approach and evidence base of the Core Strategy

1. *The Evidence Base*

The development and implementation of policies using a sound evidence base is one of the central tenets of the new planning system. To this end, PPS12 (p.15) states that: "**Core strategies must be justifiable: they must be founded on a robust and credible evidence base**" The centrepiece of this effort should be a PPG17-compliant demand and supply-led assessment of open space and recreation facilities that takes into account existing and future demand and supply. The following table will act as a "self-assessment" guide to ensure the PPG17 Assessment has been undertaken in such a way that it provides robust evidence to underpin the Core Strategy policies:



The Evidence Base - Checklist

- Has the range of information gathered by Sport England, and updated by local authorities, in relation to facility planning (Active Places and Active Places Power), been drawn upon?
- Has use been made of parallel data gathering and analysis exercises undertaken as part of initiatives such as green infrastructure planning; playing pitch strategy; indoor built facilities strategy; and sport and recreation strategy (or similar) which provide additional evidence that will help inform policy decisions?
- Does the PPG17 Assessment include an existing and future demand and supply analysis taking into account the potential locations of new development?
- Have significant cross-boundary issues, particularly relating to facility provision, been attended to?
- Has information from other local authority strategies, including sport and recreation strategies, play strategies and community strategies been considered?
- Is an Action Plan provided as part of the PPG17 Assessment that sets out how local open space shortfalls and surpluses will be addressed?
- If evidence shows a site has been identified as 'surplus to requirement' for a specific type of open space e.g. a playing field, have all alternative open space functions that site can perform been considered? (this is to conform with paragraph 10 of PPG17)

2. Core Topics for Consideration

The topics below are those Sport England would expect to be incorporated into a Core Strategy document.

- open space provision and protection;
- facility provision;
- access for all/equality of access;
- quality of provision;
- the needs of specific sports and user groups; and
- countryside recreation.



Sport England considers further evidence is required to substantiate the policy in the form of the following:

- a) open space provision and protection: Fully compliant PPG17 Assessment (including a demand and supply analysis of existing and future needs). As Synthetic Turf Pitches and Multi Use Games Areas are becoming increasingly popular as a substitute/support for playing pitches these should be included in the PPG17 Assessment.
- b) facility provision: Indoor and Outdoor Built Facilities Strategy and/or Sport and Recreation Strategy will help assess existing facilities and provide evidence for the provision of new/updated facilities. Assessing built facilities as part of the wider open space assessment is a key requirement of PPG17
- c) access for all/equality of access: this issue should be explored and assessed as an integral part of all relevant strategies and evidence base documents and is a key principle set out in PPG17.
- d) quality of provision: this issue should be explored and assessed as an integral part of all relevant strategies and evidence base documents and is a key principle set out in PPG17.
- e) the needs of specific sports and user groups: this should be set out in a Playing Pitch Strategy and Indoor and Outdoor Built Facilities Strategy through consultation with schools; local clubs/teams; County Sports Partnership and National Governing Bodies of Sport.

3. *Strategic Approach to Open Space, Sport and Recreation Provision*

Sport England strongly advocate a strategic approach to open space, sport and recreation provision and have produced a Land Use Planning Policy Statement: Planning for Sport and Active Recreation Objectives and Opportunities

http://www.sportengland.org/facilities_planning/putting_policy_into_practice/determining_applications.aspx

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to ensure the sport and recreational needs of local communities are met. Relevant policy objectives include the following:-

PLANNING POLICY OBJECTIVE 1: To ensure that a planned approach to the provision of facilities and opportunities for sport and recreation is taken by planning authorities in order to meet the needs of the local community. The level of provision should be determined locally, based on local assessments of need and take account of wider than local requirements for strategic or specialist facilities.



PLANNING POLICY OBJECTIVE 8: To promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development.

Sport England and PPG 17 (Planning for Open Space, Sport and Recreation) recognise that new housing development and significant areas of employment raise the local population, and consequently places additional pressure on existing publicly accessible sport and recreation facilities. It is essential that additional facility needs are met when development takes place so as to secure sustainable communities, meet recreational needs, and maintain and improve levels of health and well-being. In some areas existing facilities may be able to cope with additional users but in many areas facilities are already under pressure and enhancements or new provision will be needed in order to satisfy the new demand created by the development. Deficiencies may exist in relation to the overall number, range, quality and accessibility of facilities. Appropriate policy frameworks, such as Supplementary Planning Documents, Regeneration Strategies and Master Plans will need to be in place in order to maximise the benefit to sport and recreation through new development.

In order to maximise the opportunities offered by planning obligations, local planning authorities will benefit from taking a strategic approach. This should encompass the identification of deficiencies, needs and priorities through a Local Sports Development Strategy and the inclusion of enabling policies in relevant Development Plan Documents. Such an approach will provide the fairness and certainties required by the legislation, and ensure appropriate places for sport are provided which meet the needs created by new developments and support wider sports development objectives.

Sport England advocate using a strategic approach to determine the level and type of provision required for new developments to ensure a robust evidence base. A number of strategic planning tools are available to assist with this, as documented within PPG17 (Companion Guide) and Sport England's website to assist in determining the level of provision required:

- Sport England's 'Planning Contributions Kitbag', available at http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/planning_kitbag.aspx
- ODPM Circular 'Planning Obligations' 05/2005.
- Sport England 'Active Places Power' which can provide a spatial interpretation of sport facilities in the vicinity of the site, available at: www.activeplacespower.com
- Sport England's 'Facilities Planning Model' which estimates demand for sport facilities associated with proposed developments
http://www.sportengland.org/facilities_planning/putting_policy_into_practice/assessing_need_and_dem_and/facilities_planning_model/facilities_planning_model.aspx



- Sport England's 'Sport Facilities Calculator' which gives an estimate of the cost of providing indoor sport facilities:
http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/sports_facility_calculator.aspx

- Sport England Planning Bulletin No 15 'Strategic Planning for Sport'
http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/planning_bulletins.aspx?sortBy=alpha&pageNum=1

I have provided a checklist of questions that you may find useful as a "self-assessment" guide to ensuring the Core Strategy's content and procedure are appropriate and relevant:

Checklist of Content and Procedure

Theme	Does the core strategy ...
Objective-setting	<ul style="list-style-type: none"> • Set out clear objectives for sport and recreation? • Reflect community strategy objectives for sport and recreation? • Safeguard facilities? • Promote accessible facilities? • Development of a strategic framework for the provision of sport opportunities?
Developing and using the evidence base	<ul style="list-style-type: none"> • Employ a sound evidence base to help inform policy making? • Identify a hierarchy of sport and recreation provision? • Use policies which anticipate future sport and recreation needs?
Connecting policies and plans	<ul style="list-style-type: none"> • Recognise the role of sport in contributing to a wide range of spatial planning issues: regeneration, health promotion, crime reduction, quality of life etc? • Establish connections between different policy arenas?
Promoting sustainability and quality of life	<ul style="list-style-type: none"> • Promote sustainable design of sports facilities? • Promote sustainable resource management/stewardship through the



Theme	Does the core strategy ...
issues	<p>relationship between sport and the natural environment?</p> <ul style="list-style-type: none"> Promote mixed use schemes such that there is an appropriate presence of sport and recreation as part of a balanced community?
Developing spatial planning approaches	<ul style="list-style-type: none"> Maximise contributions to spatial planning initiatives such as greenspace networks or better use of the urban fringe and the wider countryside? Develop policies which respond to the expressed needs and demands of marginal or controversial sports, with due regard to resource protection and wider sustainability issues? Explore opportunities for sport and recreation to make a contribution to unprogrammed development proposals?
Using planning obligations and conditions	<ul style="list-style-type: none"> Set out the provisions in respect of sport and recreation that will be expected as part of new development? Ensure that any loss of sport and recreation facilities is adequately compensated for through like-for-like replacement, or similar?
Annual Monitoring Report	<ul style="list-style-type: none"> Monitor effectiveness of policy implementation in respect of the protection and provision of sport facilities? Compare performance between local authorities?

Sustainability Appraisal

Sustainability appraisal is a key tool in assessing the impact of policies and Sport England would offer the following advice in their production;

- | |
|--|
| <ul style="list-style-type: none"> Have appropriate documents such as the Regional Plan for Sport and a local Sport and Recreation/Leisure/Culture Strategy been used to inform the development of sustainability objectives? |
| <ul style="list-style-type: none"> Is sport and recreation included within or referred to by at least one of the sustainability objectives? |



- | |
|--|
| <ul style="list-style-type: none"> • Is there cross-referencing between objectives such that the wider contribution of sport and recreation, in respect of economic and social well-being, is recognised? |
| <ul style="list-style-type: none"> • Are appropriate indicators attached to that objective relating to the delivery of sport and recreation, such as: open space/facilities assessment; participation in sport and active recreation; and assessment of accessibility and quality of provision? |
| <ul style="list-style-type: none"> • Is there an evidence base, notably a PPG17-compliant assessment of open space and facility provision, available to appraise the contribution of sport and recreation to securing sustainability objectives? |

Specific Comments on the Content of the Core Strategy

3. Vision, aims and objectives

I support clear aims with references to health and wellbeing of existing communities, however should this also apply to new communities to be created through new residential growth? However it is noted that this may depend on the level of growth Selby is planning for and whether this will add to existing communities rather than create new ones. Either way it would be helpful to make reference to planning for new and well as the existing residents this the council perhaps has significant influence over through collecting developer contributions.

I support objectives 10 and 13 – community facilities and leisure opportunities would both have links with protecting and improving formal sporting opportunities a key objective of PPG17.

Support for objective 14 that has references to green infrastructure and the recreational potential this asset can have. Clearly playing fields that can perform a range of open space functions as well as formal sport and should also be recognised under this typology.

4. Spatial Development Strategy

4.2 National policy – PPG 17 planning policy Open Space Sport and Recreation, should also feature in this list. This PPG although under review with a consultation draft published recently still contains detailed guidance on the responsibilities of local authorities assessing needs and opportunities for open space and sport and protecting existing assets. Reference to this policy guidance supports the aforementioned plan objectives.

Policy CP8 and paragraphs 5.119 – 5.120, support references to developer contributions to recreational open space and noted that this will be delivered through a separate Infrastructure Delivery Plan. I



support this approach in principle however more detail will be required through later documents to reflect a robust evidence base to seek such contributions.

Paragraph 5.120 – It is concerning that the sustainability appraisal has identified there are shortfalls of recreational open space in the district, this needs to be evidence led through a full PPG17 compliant study rather than sustainability appraisal led, although admittedly it is helpful to flag such issues through SA work.

I note on your website that a report by Drivers Jonas entitled Retail, Commercial and Leisure study (2009) however this covers the commercial aspects of leisure as provided by the private sector, which can have sporting benefits such as ice rinks, however this appears to only assess commercial environments and does not address the needs and opportunities as intended by PPG17. Sport England is aware of a 2006 district wide open space study which catalogues open space against a national standard by per head of population. Sport England consider this approach non-compliant with PPG17 and its companion guide because it is not based on local research on need and demand for playing pitch sports.

Policy CP15 page 92, given comments on green infrastructure above and the relation to community infrastructure policies it maybe worth also including reference to playing fields that similarly should be protected and enhanced inline with PPG17.

Policy CP16 page 96, comments to creating development that encourages exercise through 'active design' and promoting access to green infrastructure of these reasons. Sport England has also produced a recent report on creating 'active design' which may also be worth evidencing. Please contact the local office to arrange one to be sent or please see the website:

http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/active_design.aspx

There are no details about how policies CP15 and 16 will be delivered, however this could be through lower tier policies as yet produced perhaps? Will a threshold to the application of this policy apply or are all developments required to consider this? Clear evidence base such as a PPG17 assessment, playing pitch strategy and open spaces study will need to inform the application of such a policy in order for this approach to be workable and sound.

Sport England has not been consulted on any evidence based material and the core strategy does not direct readers to any linked evidence base documents on the website. It is difficult in these circumstances to determine whether this draft approach is sound and workable. Sport England would be happy to provide assistance outside the formal LDF stages on collating and monitoring an evidence base for sport in Selby district and has numerous tools available to assist in evidence gathering; however I have provided the comments above to assist the council in making its own self assessment.



I hope this letter has been of some assistance to you. If you have any queries with regard to references made to Sport England documents and/or services or clarification of points referred to in this letter, please do not hesitate to contact me.

Yours sincerely

A black rectangular redaction box covering the signature of Helen Ledger.

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