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Dear Sirs

**HODGSONS LANE, SHERBURN IN ELMET**

The NPPF was published on 27 March 2012. The policies within the NPPF apply from the day of publication. Paragraph 2 is clear that NPPF must be taken in to account in the preparation of local plans.

The Inspector has invited comments in response to the publication of NPPF in relation to matters to be examined at the April Hearing Sessions. This letter considers the implications of the NPPF in relation to the Council's Proposed Changes to the Core Strategy and our submission dated 15 February 2012 submitted on behalf of Connaught Consultancy Ltd.

**Housing**

NPPF places a 'presumption in favour of sustainable development' at the heart of Framework and this is to be seen as a golden thread running through plan-making and decision-taking (Paragraph 14). For plan-making, this means that LPAs should positively seek opportunities to meet the development needs of their area.

At paragraph 17, NPPF establishes 12 planning principles which should underpin plan-making and decision taking (Paragraph 17) and includes:

*'Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made to objectively identify and then meet housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating*

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*sufficient land which is suitable for development in their areas, taking account of the needs of the residential and business communities'.*

At paragraph 47, NPPF is categoric in its push to boost significantly the supply of housing. In achieving this, NPPF requires Council's to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. NPPF maintains the requirement for Council's to demonstrate five years' worth of housing against their housing requirements but adds the requirement to provide an additional buffer of 5%, or where there has been a persistent under delivery, a buffer of 20%.

As detailed in our letter response to the Proposed Changes, we object to the housing provision rate proposed by Selby Council as it does not take into account the most up to date evidence in the latest household projections published by DCLG, Selby's SHMA 2009 and in the North Yorkshire SHMA 2011. As such, the Core Strategy risks under provision and conflicts with the proactive drive for development set out in NPPF.

To meet the requirements of NPPF, the Selby Core Strategy should positively seek opportunities to meet the development needs of its area. In this regard, Selby should be striving for higher levels of growth as evidence suggests is necessary to significantly boost the supply of housing.

As set out in our letter of 15 February 2012, there is clear evidence in the SHLAA that Sherburn can accommodate greater levels of growth than proposed in Core Strategy Policy CP2. To align with NPPF, the Core Strategy must ensure development in Sherburn is able come forward on suitable and sustainable sites to accord with the presumption in favour of sustainable development.

NPPF's requirement to identify a five year supply plus an additional buffer highlights the need for the Council to deliver more housing in the first five years of the plan period rather than restrict phasing as introduced to Policy CP2 in the Proposed Changes. Indeed, the buffer allowance requires Council's to bring forward greater levels of housing in the first five years. With Selby's record of persistent under delivery of housing, they will need to meet the 20% buffer requirement and therefore express increased provision in the first five years.

Referring to the housing provision as minimum requirements will assist in addressing the five year supply plus buffer requirement.

### **Green Belt**

NPPF takes forward the established principles relating to treatment of Green Belt set in PPG2. The fundamental aims and purposes of Green Belt remain. Green Belt boundaries should only be altered in exceptional circumstances through the preparation or a review of the Local Plan.

Given the continued national policy approach to Green Belts, our comments in

our submission to the Core Strategy Proposed Changes remain valid. The proposed Green Belt Policy should be tightened to ensure that Green Belt is only released in exceptional circumstances.

**Summary**

Overall, the NPPF adds further weight the case we have put forward for increased provision of housing in the Core Strategy, and a positive approach to development in Sherburn where there is evidence that greater levels of sustainable housing growth can be achieved than the Core Strategy currently allows for.

We trust our comments will be taken into consideration.

Yours sincerely



Charlotte Blinkhorn

cc: Connaught Consultancy Services LLP