

Selby District Council  
Core Strategy Examination in Public

Position Statement

Housing Deliverability and Green Belt Issues

28 September 2011



## **Core Strategy Housing Deliverability and Green Belt Issues In response to Inspector Request**

### **1 Introduction**

- 1.1 This paper responds to a request from the EIP Inspector that the Council reflects on housing deliverability issues in respect of Tadcaster and the suggestions at the Hearing that the Submission Draft Core Strategy (SDCS) does not deal with Green Belt issues in a sound manner.
- 1.2 The paper seeks to clarify the Council's position on these two issues, which are inextricably linked and set outs the Council's intended approach to tackle these concerns.

### **2 Background**

- 2.1 A number of objectors have raised concerns that the Core Strategy housing numbers are not deliverable due to land availability issues, especially in Tadcaster. Following the conclusions of the EIP session on 22 September, the Inspector expressed the preliminary view that, on the basis of the evidence considered at the session, the objectors' concerns appeared well founded.
- 2.2 Objections have also been submitted to the Publication Draft CS that the Core Strategy was not sound because, in broad terms:
  - there is no Policy included to protect the general extent of the Green Belt and
  - if the Council considers there may be a requirement to review the Green Belt in order to accommodate development needs over the Plan period this should be articulated in the Core Strategy rather than left for consideration at a later date and without any information of the triggers/method to be used.
- 2.3 The Inspector expressed the preliminary view on 21 September that these objections appeared to be justified.
- 2.4 The SDCS (CD1) provides for the scale and distribution of housing numbers across the District's settlements within Policies CP1 and CP2 at pages 39 and 51 respectively (and Policy CP11 indicates the employment land requirements (page 51)).
- 2.5 The SDCS (CD1) sets out that the District contains two areas of Green Belt along the western edge of the District (West Riding Green Belt) and in the northern part (York Green Belt). The Key Diagram (Figure 6, Page 31) indicates the general extent of the designations.
- 2.6 The SDCS refers to Green Belt issues in a number of paragraphs (see list

at Appendix 1) and within Policy CP1. The Council's Written Statement No.5 sets out the Council's response to Matters and Issues, Questions 2.14-2.16 for the EIP. The text refers to the intention of protecting the Green Belt but that there may be a need for localised reviews to accommodate new development.

### **3 National Policy**

#### **PPG2 Green Belts (1995)**

- 3.1 Planning Policy Guidance Note 2 states that in order to be effective, Green Belts require a degree of permanency in that they should be protected as far as can be seen ahead. For this reason they should be altered only in exceptional circumstances.
- 3.2 PPG 2 states at paragraph 2.7 that:  
"Where existing local plans are being revised or updated, existing Green Belt boundaries should not be changed unless alterations to the Structure Plan<sup>1</sup> have been approved, or other exceptional circumstances exist, which necessitate such a revision."
- 3.3 Paragraph 2.6 of PPG2 also states that "Once the general extent of a Green belt has been approved it should be altered only in exceptional circumstances. If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green belt. Similarly, detailed Green Belt boundaries defined in adopted local plans or earlier approved development plans should be altered only exceptionally."
- 3.4 It should be noted that PPG2 specifies that *boundaries* should not be changed unless necessitated by exceptional circumstances; it does not require exceptional circumstances to justify a *review*.

#### **Draft National Planning Policy Framework (July 2011)**

- 3.5 The emerging national policy continues to protect Green Belt and states that Green Belt boundaries should only be altered in exceptional circumstances. The relevant text is at paragraphs 137 to 140 of the NPPF.

### **4 Regional Policy**

#### **The Yorkshire and Humber Plan (RSS) (CD44)**

- 4.1 POLICY YH9 sets out the policy for Green Belts and Part B establishes that "Localised reviews of Green Belt boundaries may be necessary in some places to deliver the Core Approach and Sub Area policies" and Part E states that "Green Belt reviews should also consider whether exceptional circumstances exist to include additional land as Green Belt".

---

<sup>1</sup> The Structure Plan has now been superseded by the Regional Spatial Strategy

- 4.2 Paragraph 2.62 goes on to state that “The general extent of the Green Belts in the Region is shown on the Key Diagram. In general the Region’s Green Belts have helped to achieve the aims set out in paragraph 15 of PPG2, and implementation of the Plan should not require any change to their general extent. However, there may be a more specific and localised need to reconsider the extent of Green Belt to meet identifiable development needs for which locations in Regional and Sub Regional Cities and Towns are not available and for which alternative sites would be significantly less sustainable. Any such changes ought to be considered in the context of policies YH1-YH7, and is allowed for by policy YH9B.”
- 4.3 POLICY YH1: (Overall approach and key spatial priorities) Part B, 5 includes “Support Principal Towns and Local Service Centres as hubs for the rural and coastal economy and community and social infrastructure and encourage diversification of the rural economy”.
- 4.4 POLICY YH6: (Local service centres and rural and coastal areas) states that “Local Service Centres and rural and coastal areas will be protected and enhanced as attractive and vibrant places and communities, providing quality of place and excellent environmental, economic and social resource. Plans, strategies, investment decisions and programmes should achieve this through applying five specify criteria.

## **5 Core Strategy**

- 5.1 The overall scale and distribution of new development is established in the Core Strategy as well as how development is being directed towards the most sustainable locations within an appropriate settlement hierarchy. As such the focus of development is on Selby as the Principal Town and then to the two identified Local Service Centres to meet local needs (Tadcaster and Sherburn in Elmet) before allocating land in the Designated Service Villages.
- 5.2 The existing evidence (for example from the SHLAA 2008) suggested that there may be a need to review Green Belt boundaries in order to meet housing requirements over the Plan period. Para 4.7 of the SDCS also states that recent growth of Tadcaster has been restricted by Green Belt and land availability issues. However, not enough evidence existed at the time of preparing the Submission Draft Core Strategy to establish one way or the other whether Green Belt boundaries needed to be amended to accommodate development needs over the Plan period. As such the SDC merely flagged up these issues. It is however now accepted that whilst this was a pragmatic view this is not a sound approach.
- 5.3 The Council has now reviewed the new information received as part of the EIP process provided by Cunnane Town Planning at the Hearing on Thursday 22 September. This included categorical statements on behalf of certain landowners that some sites would definitely not be made available for development during the Plan period. The latest information is summarised at Appendix 2 (table of sites, capacity and map).

- 5.4 The implication of this new evidence so far is that the Council considers that the housing land requirement for the Tadcaster Local Service Centre cannot be met on non-Green Belt land.
- 5.5 In addition, work carried out by the Council on preparing the Site Allocation DPD has identified that proposed Designated Service Villages in the Core Strategy within the Green Belt areas have either insufficient capacity to accommodate proposed growth in the Plan period and/or in the next plan period.
- 5.6 Tadcaster is an established market town and a high order settlement in the settlement hierarchy. This is recognised by RSS and it is designated as a Local Service Centre (LSC) in the Core Strategy.
- 5.7 The Council considers it imperative that Tadcaster should fulfil its role in the settlement hierarchy as a Local Service centre and meet the development needs identified. It is not appropriate to consider transferring the requirement to alternative locations.
- 5.8 The Council strongly takes the view that Tadcaster should meet its fair share of development; that is, at the level allocated to it in the SDCS. Further, the settlement hierarchy/sequential approach to identifying the most sustainable locations should be preserved and that this cannot be achieved without reviewing Green Belt at Tadcaster.
- 5.9 The Council therefore considers that there is sufficient evidence at this stage to:
- a) establish the need for a localised review of the Green Belt around Tadcaster and
  - b) plan for undertaking a comprehensive District wide review of the Green Belt through a subsequent Site Allocations DPD.
- 5.10 The investigation of whether there are exceptional circumstances which necessitate an alteration to Green Belt boundaries will be considered further in the light of evidence gathered from the District wide review.

## **6 Council's Proposed Approach**

- 6.1 Because a Green Belt review is a significant issue for the District in meeting development required at a strategic level the Council tables the following approach.
- 6.2 The Core Strategy should include a new policy, the scope of which should include that:
- the general extent of the Green Belt is to be protected in line with PPG2 and RSS
  - a localised review is required at Tadcaster to meet RSS and Core Strategy objectives including delivering housing land requirements

- a District wide review across the whole settlement hierarchy will be undertaken to identify if further amendments are required to accommodate development outside the LSCs;
- and that such reviews should be carried out as part of the Site Allocations DPD process.

6.3 The intention is that the Core Strategy will establish appropriate and robust guiding principles to enable the necessary Green Belt reviews to be undertaken in the Site Allocations DPD. The Council propose to gather proportionate evidence and carry out public consultation on the methodology for the reviews and set out the parameters in a new Core Strategy policy. The methodology and policy will be subject to Sustainability Appraisal.

6.4 The reviews will consider the necessity of designating Safeguarded Land outside Development Limits to allow for longevity of boundaries beyond the current plan period and not just amending settlement boundaries for immediate release.

## 7 Conclusions and Timetable

7.1 The Council considers that it is necessary for the Core Strategy EIP to be adjourned to allow for the process outlined above being undertaken.

7.2 The following timetable is suggested:

Evidence Gathering and Sustainability Appraisal	October – November 2011
Draft Policy to be Considered by Councillors	November 2011
Public Consultation	January 2012
Consideration by Councillors	February 2012
Reconvened EIP	March 2012
Inspector's Report	April 2012
Adoption	May 2012

**Appendix 1**

**All References to Green Belt in SD CS**

**Paragraphs**

2.5 , 2.34, 2.35, 3.5, 4.7, 4.37, 4.38, 4.39, 4.40, 4.41 - Policy CP1A (d), 4.49, 6.37, 7.53

**Appendix 2**

**SHLAA sites Within Tadcaster Parish (8-17 Years / AMBER)**

**Non – Green Belt Sites**

Site Ref	Revised Time Period	2008 SHLAA Final Time Period	Site Size (ha)	SDC Yield Estimate	Cunnane suggested Yield Estimate	Green Belt	Fresh information from EIP
PHS/73/005	8 – 17 Years	8 – 17 Years	2.11	74	250 (inc. 010 site)	No	SSOB(T) actively promoting site. Along with site ref 010, capable of delivering 250 dwellings. Negotiations have been ongoing regarding Flood Alleviation Scheme and linking this site with 010 with density moved to this part of the site. Sites joined together to overcome flood risk issues.
PHS/73/009	8 – 17 Years	8 – 17 Years	0.52	18	35	No	SSOB(T) owned. Can be brought forward in early part of plan?? No details of timeframe. Capable of providing 35 dwellings.
PHS/73/010	8 – 17 Years	8 – 17 Years	1.62	57	-	No	SSOB(T) actively promoting site. See ref 005.
				<b>149</b>	<b>285</b>		

**SHLAA sites Within Tadcaster Parish (8-17 Years / AMBER)**

**Within Green Belt**

PHS/73/012	8 – 17 Years	8 – 17 Years	4.4	154	-	Yes	Carter Jonas acting for owners - Grimston Park Estate – confirmed site is available and developable within plan period subject to increasing capacity at WWTW.
PHS/73/013	8 – 17 Years	8 – 17 Years	11	385	-	Yes	Carter Jonas acting for owners - Grimston Park Estate – confirmed site is available and developable within plan period subject to increasing capacity at WWTW.
				<b>539</b>			



**SHLAA Sites within Tadcaster (18+ Years / RED)**

**Non – Green Belt Sites**

Site Ref	Revised Time Period	2008 SHLAA Final Time Period	Site Size (ha)	SDC Yield Estimate	Cunnane suggested Yield Estimate	Green Belt	Fresh information from EIP
PHS/73/001	18+ Years	8 – 17 Years	2.46	86	-	No	Has lapsed Planning Permission. Not available. Cunnanes deal with agent (owner not known) - advised by agent land will not be released within plan period.
PHS/73/002	18+ Years	18+ Years	5.33	187	-	No	Not available. Cunnanes deal with agent (owner not known) - advised by agent land will not be released within plan period.
PHS/73/003	18+ Years	18+ Years	1.9	66	-	No	Not available. Cunnanes deal with agent (owner not known) - advised by agent land will not be released within plan period.
PHS/73/004	18+ Years	18+ Years	7.65	268	-	No	Not available. Cunnanes deal with agent (owner not known) - advised by agent land will not be released within plan period.
PHS/73/006	18+ Years	8 – 17 Years	3.48	120	-	No	Not available. Cunnanes deal with agent (owner not known) - advised by agent land will not be released within plan period.
PHS/73/007	18+ Years	8 – 17 Years	9	315	-	No	Not available. Cunnanes deal with agent (owner not known) - advised by agent land will not be released within plan period.
PHS/73/011	18+ Years	18+ Years	0.79	28	-	No	Submissions to SADPD state that the site is owned by Grimston Park Estates but not available for housing as it would conflict with uses at Willow Farm. It is therefore being promoted for employment use. The site is Outside Development Limits.
				<b>1070</b>			

**SHLAA Sites within Tadcaster (18+ Years / RED)**

**Within Green Belt**

PHS/73/008	18+ Years	8 – 17 Years	8.32	291	-	No	Landowner not known.
				<b>291</b>			

**Tadcaster Map**



*BLANK PAGE*