

1. Response to SSOBT (received by the Council 19 March 2013)

- 1.1 The Council is satisfied that its submission of 6 March 2013 adequately deals with the SSOBT submission. The Council remain of the view that the assessment of the likely impacts of the expected outcomes of the strategy including additional delivery through windfalls has been properly undertaken and that the inclusion of an indicative figure of 105dpa in the footnote of Policy CP2 and referred to in text, does not necessitate further or a separate SA at this stage. The Council are content that the legal requirements of the Regulations have been met.

2. Response to Roland Bolton (received by the Council 20 March 2013)

- 2.1 The Council notes that the submission tends in places to reopen debate on the objectively assessed need, rather than to discuss SA/SEA itself. The Council will not respond in detail to such debate as its case for 450dpa and rejection of 550dpa (being simply the SNPP figure) is already made extensively. The Council would reiterate that the ONS projections are not the single factor in an objectively assessed need – there are other factors such as migration, economic growth etc that must be included in a sophisticated assessment. This, the Council has done and set out its position in numerous papers. However the Council will respond to the points which have been raised as far as they relate to the need to assess ‘reasonable alternatives’. In essence the Council consider, as already submitted, that the inclusion of the 550dpa is not a reasonable alternative and is therefore not required to be SA’d.
- 2.2 The Council wish to make clear that it **does not** state that the dwelling figure of 450dpa represents an Objective as summarised by Mr Bolton’s submission. The Council’s seventeen stated objectives are set out in the Core Strategy (Para 3.5 Section 3). Amongst this range of objectives, which need to be balanced and assessed, Number 5 includes “*Providing an appropriate and sustainable mix of market, affordable and special needs housing to meet the needs of District residents, particularly young people and older people.*” The figure of 450dpa is the *objectively assessed need* (unfortunately similar terminology, but used correctly by the Council throughout) arrived at to meet this objective, in accordance with the NPPF.
- 2.3 For the purposes of SA therefore, 450dpa must be part of the objective to be assessed. The SA correctly considers: the provision of housing to meet the needs of 450dpa in the District and the alternative methods of delivering it.
- 2.4 Mr Bolton suggests that for the purposes of SA 550dpa is an alternative and that the SA should assess: the provision of housing to meet the needs of District and the alternative quantities that that need

Selby District Council response to the submissions made by SSOBT and Roland Bolton RE THE COUNCIL SA/SEA Statement of 6 March 2013

- may be. The above cannot be correct because need is not a figure based on the ability of the District to accommodate it. Instead, need is established (eg through the ARUP papers and background papers) and then the strategy considers alternative ways of delivering it.
- 2.5 In response to Mr Bolton's submission regarding what are the alternatives that should be subject to SA, notwithstanding the fact that there is no requirement to do so, the Council cannot in any event see any reasonable alternative options for Objective 5: It could only:
- i. Plan to meet the need: (the chosen option)
 - ii. Plan to not meet the need (not a reasonable alternative)
 - iii. Plan for more than the need (not a reasonable alternative)
- 2.6 With reference to point (iii) above, to plan for 550dpa would not meet the objective which is to meet the needs only. Further, the Council could not justify through evidence any reason for providing more than is needed, thus it is not a reasonable alternative.
- 2.7 The SA therefore correctly assesses the alternative methods of delivering the need, not the alternative needs. The SA is not therefore deficient.
- 2.8 The Stockholm case relied upon by Mr Bolton can have little relevance as the SDCS must be consistent with the NPPF which sets out (in paragraph 47) that plans should meet objectively assessed needs in full (and not, it is to be noted, cater for a range of potential needs) taking into account the stated factors, which the Council has done. The Swedish planning system will inevitably impose its own, different requirements in respect of plan-making. In any case, the example as expressed in paragraph 3.12 of Mr Bolton's submission does not directly reflect the comparison of his purported alternatives of 450dpa and 550dpa.
- 2.9 In response to Para 2.6 of Mr Bolton's submission: Mr Bolton infers that by stating 105dpa windfall, the Council's objectively assessed need is effectively now 555dpa. However, this is inaccurate as it confuses the objectively assessed need with the anticipated annual housing delivery. The Council does not plan to rely on windfall to meet the need.
- 2.10 The two elements that make up 555dpa (450dpa need plus windfall) have both been subject to SA individually and cumulatively. Their delivery will be different arising from different policies: some planned-for and some coming forward speculatively, therefore it would be wrong to appraise them as a single figure. Paragraph 17 of the Council's submission of 6 March sets out how the two elements have been appraised, and that the SA also considers the cumulative impacts.
- 2.11 In Para 4.9 of Mr Bolton's submission: The SA itself would not include quantitative research in to the objectively assessed need: that is done in the background papers/ARUP report etc. The SA work does consider that evidence in the round.

Selby District Council response to the submissions made by SSOBT and Roland Bolton RE THE COUNCIL SA/SEA Statement of 6 March 2013

- 2.12 On issues of clarity with respect to specific points that Mr Bolton raises, the Council would comment as follows: Para 1.4 – The Council **does not** accept that the 2008 households projections ‘*would require some 550 dwellings*’. The Council **does** accept that the latest projections are the correct starting point for assessing the housing requirement locally and in accordance with NPPF.
- 2.13 In response to Mr Bolton’s reliance on paragraph 3.15 of the EU Guidance, the Council has pursued the obvious alternatives envisaged in that paragraph, rather than the alternative scenario development he refers to that does not form part of what NPPF requires.

3. Conclusion

- 3.1 The Council considers that the assessment of the likely impacts of the expected outcomes of the strategy including additional delivery through windfalls has been properly undertaken and that the inclusion of an indicative figure of 105dpa in the footnote of Policy CP2 and referred to in text, does not necessitate further or a separate SA at this stage.
- 3.2 The Council considers that it has properly appraised the reasonable alternatives to meeting the plan’s objectives, and that it is not necessary to appraise alternative versions of the level of need and/or that there are no such reasonable alternative versions in any event.
- 3.3 The submissions by SSOBT and Mr Bolton do not alter the Council’s position; that is, the Council remains of the view that the legal requirements of the SA Regulations have been met, and that the SA is thorough and robust.