

147

victoria lawes

From: Barry, Michael [Michael.Barry@carterjonas.co.uk]
Sent: 18 December 2008 16:46
To: ldf
Subject: Core Strategy Consultation
Attachments: Selby CS - Grimston Pk.pdf

Sir/Madam

Please find enclosed representations to the Core Strategy Further Options submitted on behalf of The Grimston Park Est.

Please note that a hard copy will follow in the post.


Please do not hesitate if you require any further information and it would be appreciated if you could confirm receipt of this e-mail.


Regards

Michael Barry

Michael Barry BA MSc MRTPI
Planner
For and on behalf of Carter Jonas LLP
Tel: 01423 707807
Fax: 01423 521373
Mob: 07713 101652



 [Click here](#) to access the latest Carter Jonas newsletters and publications

 Please consider the environment - do you really need to print this email?

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. Any views or opinions presented are solely those of Michael Barry and do not necessarily represent those of Carter Jonas LLP. If you are not the intended recipient be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited.

Although the firm operates anti-virus programmes, it does not accept responsibility for any damage whatsoever that is caused by viruses being passed.

Carter Jonas LLP is a Limited Liability corporate body which has "Members" and not "Partners". Any representative of Carter Jonas LLP described as "Partner" is a Member or an employee of Carter Jonas LLP and is not a "Partner" in a Partnership. The term Partner has been adopted, with effect from 01 May 2005, because it is an accepted way of referring to senior professionals.

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

18/12/2008

Property Consultants

Carter Jonas LLP
13-15 Albert Street
Harrogate
North Yorkshire HG1 1JX

Telephone 01423 523423
Facsimile 01423 521373

Mayfair	Long Melford
Chelsea	Marlborough
Marylebone	North Wales
Holland Park	Northampton
Cambridge	Oxford
Harrogate	Peterborough
Huddersfield	Shrewsbury
Kendal	Worcester
Leeds	York

Our ref: MB/
Your ref:
Direct line: 01423 707807
Secretary: 01423 707822
Email: Michael.barry@carterjonas.co.uk
Date: 17 December 2008

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

FAO T Heselton Esq

Dear Mr Heselton

Selby District LDF: Core Strategy Consultation on Further Options

Carter Jonas LLP represents the interests of the **The Grimston Park Estate** in respect of their land and property interests across the District. Most of the Estate land is located in the north western part of the District and in particular around Tadcaster, Ulleskelf, Towton and Kirby Wharfe. Some of the landholding were submitted to the Council's "Call for Sites" as part of the preparation of the Strategic Housing Land Availability Assessment (SHLAA).

We are instructed to make representations to the emerging Core Strategy, as and when necessary, including to this Further Options document which is currently published for consultation.

Introduction

In making these representations we are aware that there has been a significant delay in between the first set of options published in 2006 and the current document. In that time there has been a substantial amount of new Government guidance (including modifications to the LDF plan preparation process), as well as the adoption of the Yorkshire and Humber Plan (May 2008). This document is currently the subject of a limited review which may see a substantial increase in housing numbers to be delivered across the Region and a consequent requirement to review Green Belt boundaries. Presumably Selby will be expected to accommodate a proportion of any increased housing requirement.

Against this background the main thrust of our comments focuses upon the Council's housing proposals and the broader aspirations for the District. We also make a number of general observations about the format and structure of the Further Options document. A completed copy of the Council's Questionnaire and Comments Form is attached.

Carter Jonas LLP is a limited liability partnership registered in England and Wales no. OC304417. Reg. Office 127 Mount Street, London W1K 3NT.

Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

From the supporting material it would appear that the Council has followed a structured approach to identifying the selected settlements having regard to benchmark work produced in the Region. We broadly accept the steps used to identify the 20 'Primary Villages'.

As a result of this process, we are especially pleased that the Council responded positively to our previous representations and has identified that Ulleskelf fits into the settlement hierarchy as a Primary Village. This status reflects the range of services in the village as well as the overall sustainability of the settlement due to the presence of a railway station providing services to York, Leeds and Selby, as well as regular bus services.

Both PPS3 and RSS seek to focus development towards existing transport infrastructure nodes particularly where there is capacity or the ability to accommodate such development. In this case Ulleskelf represents an appropriate location to accommodate a sizable quantum of development into the future.

Nevertheless we also consider that as part of the selection process the Council should consider the potential of all the secondary villages identified in the current development plan and not just those settlements with a population of 600 or more. This will have the effect of alleviating concerns about the thoroughness of the selection process and will ensure that no settlement of particular merit may be missed out. This step will enhance the credibility of the evidence base.

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1?

No. While we broadly support the level of housing proposed for the Primary Villages, we consider that the level of housing proposed for Tadcaster and the Secondary Villages to be too low. Indeed we are not convinced by the Council's rationale and thinking behind the options set out in this consultation document.

b) In particular, should there be more or less housing in Tadcaster?

As a starting point, we consider that there should be a considerable uplift in the quantum of housing development targeted to Tadcaster. We are of the view that the provision of just 5% of the District's housing requirement is totally inadequate for a settlement of the size, sustainability and functionality of Tadcaster. As a minimum we would suggest that the quantum of development focused into Tadcaster should be proportionate to the size of the town's population

We are not convinced by the Council's justification for this approach, which appears to be set out in paragraph 3.14 of the Further Options document. This states that the low proportion of housing to be distributed to Tadcaster reflects 'Landowner Constraints'. To

our mind this does not present a valid reason to limit the growth of the settlement. Indeed we take the view that it prejudices the outcome of the SHLAA process which is supposedly an objective appraisal of the availability and deliverability of land, regardless of planning status.

Landownership issues may affect availability of sites; however, we are aware that a number of sites have been put forward around Tadcaster as part of the SHLAA process. Indeed, a number of sites have been put forward by Carter Jonas on behalf of our client. This includes two sites in Tadcaster, (SHLAA Ref. PHS/73/012 and PHS/73/013). Both sites immediately abut the northern boundary of the settlement and are sustainably located close to the centre of the Town. These sites are both unconstrained and combined cover circa 15 ha, which if developed at 30 dph could accommodate circa 450 new homes. These sites are available and in a sustainable location and thus can make a contribution to the housing requirement of the settlement. As such there is no justifiable reason as to why, 'land ownership constraints' can be considered a valid reason to severely restrict future housing development in Tadcaster as proposed.

Tadcaster is the second largest settlement in the District. Population data from the 2001 Census indicates a population of 6,039 in Tadcaster, around 8% of the District's total population. Tadcaster also includes some of the largest employers in the District, together with a comprehensive range of services including retailing, education and has frequent bus services to the higher order settlements of Leeds and York. Tadcaster like the other main towns in the District has been subject to the Urban Renaissance programme. Having regard to the importance of linking homes with jobs and the existing function of the settlement, we take the view that the Council's proposal to direct only 5% of the District's housing requirement to Tadcaster would reinforce the on-going decline in the settlement and undermine the on-going regeneration programmes. As a result it cannot be supported.

On this basis, we consider that at least 8% of the district housing requirement should be allocated to Tadcaster. This would mean that the Council should identify sufficient land for at least 560 new homes over the remaining LDF period. We consider that this housing could be drawn from a mixture of the less sustainable Primary villages as well as Sherburn in Elmet which has a disproportionate level of growth and from the various urban extensions proposed for Selby.

We consider that the major redevelopment of the Olympia Mills should be supported but object to suggestions that there is need for multiple strategic extensions. We consider that no other large-scale allocations should be made, and that housing land should be accommodated on smaller infilling and rounding off brownfield and greenfield sites in around Selby and other settlements within the boundaries of the proposed Selby AAP.

c) In particular, should there be more or less housing in Sherburn in Elmet?

We consider that there should be a reduction in the quantum of housing in Sherburn in Elmet. We would suggest that in the region of 5% of the district housing requirement should be accommodated here and that the surplus housing should be distributed to Tadcaster.

Question 2 Further Comments

On a more general point responding to Question 2 we are of the view that for a 'Further Options' document it appears to be devoid of real options. PPS3 identifies urban extensions as just one part of the Strategic Planning Toolkit to be considered. We do not consider however that any real consideration of other options has been made. Such an approach is not consistent with the tests of soundness as set out in PPS12.

As a result we suggest that the Council should comprehensively review the options put forward in this instance and consider reissuing this consultation to seek the view of stakeholders on the proportion of housing to be distributed to various settlements across the District and how this housing is to be accommodated.

Furthermore we ask that any uplift in the level of housing to be provided in Selby as part of the Review process to the RSS be distributed in such a way that it will contribute to sustainable growth across the district.

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1 = highest, 6 = lowest)

- (6) Site A - Cross Hills Lane
- (3) Site B - West of Wistow Road
- (2) Site C - Bodgate/Monk Lane
- (1) Site D - Olympia Mills
- (4) Site E - Baffam Lane
- (5) Site F - Foxhill Lane/Brackenhill Lane

Any other comments?

As we have explained we have concerns about the over reliance strategic extensions to Selby. We would suggest that the only urban extension should be at the Olympia Mills complemented by a series of modest/small of brown and green field infill and rounding off sites within and adjoining Selby and the other settlements that create the Selby Area Action Plan Area. Any further major Urban Extension into the floodplain is unsustainable and potentially unviable given the present difficulties faced by the housing market.

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

We consider that market housing should be distributed to all settlements throughout the district including the Secondary Villages and through conversion proposals.

Government Guidance and Regional Policy directs most new development to the larger more sustainable settlements but also advocates steering modest amounts of development to smaller settlements to meet the needs of communities and the market and to sustain the

rural economy. Paragraph 30 of PPS3 supports and appreciates the importance of housing development in small rural settlements and supports approaches through which this housing can be delivered. It states:

'In providing for affordable housing in rural communities, where opportunities for delivering affordable housing that contributes to the creation and maintenance of sustainable rural communities in market towns and villages. This requires planning at local and regional level adopting a positive and pro-active approach which is informed by evidence, with clear targets for the delivery of rural affordable housing.'

Yet the Further Options Core Strategy suggests that no future market housing would be favoured in the smaller settlements of the district and that only affordable housing exception schemes will be supported within the Secondary Villages.

Consequently we consider that there should be an uplift of the proportion of housing allocated to the 'Secondary Villages' to ensure the delivery of housing to meet the needs of these settlements. We suggest that in each of these settlements a single housing site should identify to accommodate in the region of 6 homes of which at least 3 would be affordable. The delivery of these houses could be phased in such a way that they would come forward post 2012 or later. The delivery of this housing, although modest, would result in the delivery of 6 families and would provide an important boon to the vitality of these settlements.

As well as granting certainty over the delivery of affordable housing. Through the allocation of housing land this approach would also ensure the best sites at these settlements would come forward for residential development, this is accordant with PPS3 and the aspirations and objectives of the SHLAA.

In accordance with PPS3 such a proposal would represent a positive and proactive step that would result in the controlled delivery of housing to meet the needs of local communities in all settlements. Reliance on the delivery of housing through affordable exceptions sites is not sustainable. It is significant that to date there has never been an affordable housing exceptions site delivered In the district.

The allocation of 6 units on allocated sites to all 42 secondary villages of which at least 3 would be affordable would ensure the delivery of affordable housing to these settlements as the 'cross subsidy' would greatly enhance the deliverability of affordable housing in the parts of the District most in need of its provision.

This proposal would result in the allocation of land for 252 new homes across the district's 42 'Secondary Settlements' and would constitute just 2.5% of the total housing distributed to Selby over the lifetime of the RSS. It is considered that this housing could be drawn from Selby and in particular the over emphasis placed on use of urban extensions to meet the requirements of the settlement.

We consider that in line with PPS7, options for the residential conversion of redundant rural buildings should be retained. Such a policy would support the process of rural diversification and would result in only limited housing over the RSS period. Indeed to not include such a policy would conflict with the guidance contained in PPS7.

Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why.

We oppose the proposed change to affordable housing thresholds as set out presently. While we accept that Selby like all other districts has a high level of affordable housing need we do not consider that there is adequate evidence to justify such a reduction in affordable housing thresholds. We understand that ARC4 has been commissioned to undertake a Strategic Housing Market Assessment.

PPS3 states that 15 units is the indicative national threshold. In exceptional circumstances LPA's can set lower minimum thresholds where viable and practical (paragraph 29), although any such approach must be justified. We remain to be convinced that the Council has provided sufficient evidence or justification to underpin such changes.

On this basis we are concerned at the failure of the Council to test the viability of proposed changes to the affordable housing thresholds. As a consequence we consider that the Council should test the viability of the proposals before any of further versions of this document are produced.

Q6 In order to help meet the need for affordable housing, do you agree with the use of commuted sums for housing schemes below the proposed thresholds? If not please explain why

As above we consider that the Council has failed to provide justification for such a step.

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?

Site G - Olympia Park (land adjoining Selby Bypass) Site H - Burn Airfield

Have you any other suggestions?

We support the location of a strategic employment site at Site G, Olympia Park. This is a sustainable location for such a strategic extension close to the railway station, town centre and housing. A key premise of both the RSS and PPS3 is the linking of jobs and homes together with focusing development to existing transport links whenever possible. We are of the view that this presents the most logical location for a major employment site.

Q8 Please tell us whether you agree or disagree with the following statements:

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward.' (Agree)
- B - 'Existing employment premises should be protected from redevelopment where there is evidence of market need.' (Agree)

- C - 'For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations.' (Agree)
- D - 'New housing development should be balanced with an appropriate level of new business development.' (Agree)

Any other comments?

Not at this stage.

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

Provided it does not harm the viability of the major development in question we would have no difficulty supporting such a proposal. However we consider that a more appropriate and achievable approach would be a greater onus on building efficiency and sustainability.

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- Broadband
- Community Facilities x
- Cycle and walking infrastructure x
- Education x
- Green infrastructure x
- Health
- Public Realm x
- Rail and Bus infrastructure x
- Recreation open space x
- Recycling x
- Road infrastructure x

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

We support the opportunities to create a more focused and sustainable green infrastructure combined with a full appraisal of existing green allocations. As part of the LDF the Council should commit to a full review of existing allocations and consider the revision of local landscape designations, in particular the retention of 'Strategic Countryside Gaps' favored within the current Local Plan.

The retention of such non-statutory designations should undergo considered review as in many instances their designation has been broad brush and non-specific and can result in

suitable potential development sites being left inappropriately constrained. A central tenant of PPS3 is that the best and most sustainable of development sites are delivered, this approach is a key motivation behind the SHLAA.

Consequently we consider that rather than those unwieldy and artificial planning policy designations which includes Green Belts, the Council should favour the use of focused and indeed usable green infrastructure to assist the setting, image and connectivity of the district's landscape and settlements.

Q12. Housing Mix

We consider that as per PPS3 the mix of housing delivered in Selby be of a type that meets the needs of the housing market as identified by a Strategic Housing Market Assessment.

We consider that this formative stage of the Core Strategy should be informed by such an assessment and we consider that as a matter of urgency the Council commence work on the preparation of such evidence and call for its findings to be reflected in emerging housing policy.

Q13. Gypsies and Travellers

Of the options proposed we would be most supportive of option A. We consider that sites should be distributed across the district with particular focus on those locations of greatest need.

Q14. Site Details

We consider that sites should be of a type to allow the greatest flexibility. As such we would support Option B of those listed.

Q15. Travelling Showpeople

Accommodation should be put in the most sustainable locations which would be the main settlements.

Q16 Other Comments

General Comment

In conjunction with the comments provided above we have a number of fundamental concerns over the Core Strategy Further Options Consultation Document as published.

Firstly we consider that the Core Strategy has been undermined by the failure of the Council to set the context for the production of this document in respect to the RSS, Community Strategy, Regional Economic Strategy, Physical Constraints and perhaps most significantly the socio-economic context of the district. We consider that this 'framing' process is very important and should provide the bedrock from which the Core Strategy flows.

Secondly, we consider that the Core Strategy should set out clear aims and aspirations and a consideration should be made of how each policy works towards the meeting of these aims.

As an 'Options' consultation document there is a marked absence of real options proposed. PPS12 suggests that stakeholders should be given the opportunity from the outset to provide comment on the main options. We are of the view that there appears to be a conspicuous absence of real options for consideration as most of the principle decisions have been made by Council in their 'Background' papers.

We note that the evidence base underpinning the assumptions of the Further Options is virtually non-existent. Fundamental information such as the SHLAA, Strategic Housing Market Assessment and Viability testing of affordable housing policy needs to be available to justify and support emerging planning policy.

Green Belt

We note and are disappointed that throughout the Further Options Core Strategy no reference to or explanation of the issues relating to the Green Belt has been provided. Much of the western of the District is constrained by the West Yorkshire Green Belt. As such this should be a major consideration in the development of policy.

In line with paragraph 2.12 of PPG2 the preparation of the Core Strategy is an opportunity to consider possible revisions to the defined Green Belt boundary, guidance states that local authorities *'should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period'*. This is particularly important given the ongoing Update of the RSS.

In line with PPS3 and the SHLAA process, a review of the Green Belt and a review of the status of some sites in the Green Belt will provide certainty that the best and most sustainable sites have come forward for development.

I hope that you find these comments helpful and we look forward to opportunities to be involved with emerging policy in greater detail at a later stage.

Yours sincerely

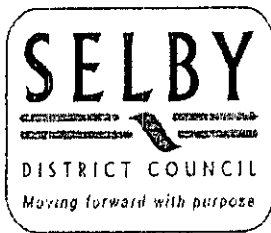


MICHAEL BARRY BA (Hons) MSc MRTPI

Planner

For and on behalf of Carter Jonas LLP

Enc.



**Selby District Core Strategy
Questionnaire and Comments Form
for Consultation on Further Options
November 2008**



Office use
Ackd
ID No

Introduction

The Core Strategy document 'Consultation on Further Options' is available at www.selby.gov.uk, from 'Access Selby' and contact centres in Sherburn and Tadcaster, and all libraries in the District. The document is split into chapters on-line, and the questions below are accompanied by a note of the paragraphs that relate to each subject, for ease of completion. Should you wish to be sent a hard copy of the consultation document please contact the LDF Team, using the details on the last page.

The Council is particularly looking for comments on the following questions. You are welcome to add further comments relevant to the Core Strategy Further Options.

How to make comments:

- Please complete the form in dark ink (add extra sheets if you wish) and send to the address on the last page; or
- Fill in online at www.selby.gov.uk - follow the link from the Council's "In Focus" on the front page of the website.
- **Please submit your comments by 5pm on Thursday 18 December 2008.**
- 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	CARTER JONAS LLP
Organisation	GRIMSTON PARK EST.	Organisation	
Address	C/O AGENT	Address	13-15 ALBERT ST HARROGATE
Postcode		Postcode	HG1 1SX
Tel		Tel	01423 707807
Fax		Fax	
Email		Email	michael.barry@carterjonas.co.uk

Housing

Scale and Distribution of New Housing (see para 3.1 – 3.31)

Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

PLEASE SEE ENCLOSED LETTER

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

- a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1? **Yes/No**

PLEASE SEE ENCLOSED LETTER

- b) In particular, should there be more or less housing in Tadcaster? **More/Less**

PLEASE SEE ENCLOSED LETTER

- c) In particular, should there be more or less housing in Sherburn in Elmet? **More/Less**

PLEASE SEE ENCLOSED LETTER

Please explain why in each case.

Strategic Housing Sites at Selby (see para 3.32- 3.41)

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1= highest, 6 = lowest)

- () Site A – Cross Hills Lane
- () Site B – West of Wistow Road
- () Site C – Bondgate/Monk Lane
- () Site D – Olympia Mills
- () Site E – Baffam Lane
- () Site F – Foxhill Lane/Brackenhill Lane

Any other comments?

PLEASE SEE ENCLOSED LETTER

Managing Housing Supply (see para 3.42 – 3.45)

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

PLEASE SEE ENCLOSED LETTER

Affordable Housing (see para 3.46 – 3.59)

Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why.

PLEASE SEE ENCLOSED LETTER

Q6 In order to help meet the need for affordable housing, do you agree with the use of commuted sums for housing schemes below the proposed thresholds? If not please explain why

PLEASE SEE ENCLOSED LETTER

Economy

Strategic Employment Sites (see para 4.3 – 4.12)

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?

Site G - Olympia Park (land adjoining Selby Bypass) Site H – Burn Airfield

Have you any other suggestions?

PLEASE SEE ENCLOSED LETTER

Employment Land (see para 4.13)

Q8 Please tell us whether you agree or disagree with the following statements:

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward.' (**Agree/Disagree**)
- B - 'Existing employment premises should be protected from redevelopment where there is evidence of market need.' (**Agree/Disagree**)
- C - 'For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations.' (**Agree/Disagree**)
- D - 'New housing development should be balanced with an appropriate level of new business development.' (**Agree/Disagree**)

Any other comments?

Climate Change Issues (see para 5.1 – 5.5)

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

PLEASE SEE ENCLOSED LETTER

Sustainable Communities (see para 6.1 – 6.8)**Infrastructure Provision**

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- | | |
|-------------------------------------|----------------------------------|
| <input type="checkbox"/> | Broadband |
| <input checked="" type="checkbox"/> | Community Facilities |
| <input checked="" type="checkbox"/> | Cycle and walking infrastructure |
| <input checked="" type="checkbox"/> | Education |
| <input checked="" type="checkbox"/> | Green infrastructure |
| <input type="checkbox"/> | Health |
| <input checked="" type="checkbox"/> | Public Realm |
| <input checked="" type="checkbox"/> | Rail and Bus infrastructure |
| <input checked="" type="checkbox"/> | Recreation open space |
| <input checked="" type="checkbox"/> | Recycling |
| <input checked="" type="checkbox"/> | Road infrastructure |
| <input type="checkbox"/> | Other (please specify) |

Green Infrastructure

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

PLEASE SEE ENCLOSED LETTER

Housing Mix (see para 6.9 – 6.10)

Q12 Do you consider that

- a) More housing should be in the form of small dwellings (flats and terraced housing) **Yes/No**
or
- b) More housing should be in the form of 3-4 bedroom family houses **Yes/No**

PLEASE SEE ENCLOSED LETTER

Gypsies/Travellers and Show People (see para 6.11 – 6.15)

Gypsies and Travellers

Q13 In making appropriate provision for gypsies and travellers, do you agree or disagree with the following options (please mark your choice):

- (**Agree/Disagree**) Option A – New sites should be spread across the District.
- (**Agree/Disagree**) Option B – New sites should be located in or close to the towns and primary Villages.
- (**Agree/Disagree**) Option C – Expanding the existing sites

Q14 Do you agree or disagree with the following options:

- (**Agree/Disagree**) Option A – Sites should be sought that accommodate between eight and twelve pitches.
- (**Agree/Disagree**) Option B – Individual pitches should be encouraged to allow flexibility and choice for gypsies and travellers distributed across the District.
- (**Agree/Disagree**) Option C – A combination of A and B; one site of between eight and twelve pitches plus individual pitches.

Travelling Showpeople

Q15 The indications are that only limited provision is required within Selby District for travelling showpeople. If provision is required, should an area of search be:

- (**Agree/Disagree**) Option A – In or close to the towns of Selby, Tadcaster or Sherburn in Elmet?
- (**Agree/Disagree**) Option B – In close proximity to the strategic road network (such as M62, A1, and A64)?

Please add any further comments you may have about the Core Strategy including the evidence contained in the Background Papers, which are also available on the Councils' website: (please add extra sheets)


PLEASE SEE ENCLOSED LETTER

Notification

Please tick the boxes below if you would like to be informed when

- The Core Strategy has been submitted to the Secretary of State for independent examination?
- The recommendations have been published of any person appointed to carry out an independent examination of the Core Strategy?
- The Core Strategy has been adopted?

Signed



Dated

17/12/08

If you have any questions or need some further information please contact the Local Development Framework Team on 01757 292063 or by email to ldf@selby.gov.uk.

Please return this form to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB

No later than 17.00hrs (5pm) on Thursday 18 December 2008.

victoria lawes

148

From: Barry, Michael [Michael.Barry@carterjonas.co.uk]
Sent: 18 December 2008 16:49
To: ldf
Subject: Core Strategy Consultation
Attachments: Waddington Selby CS.pdf

Sir/Madam

Please find enclosed representations to the Core Strategy Further Options submitted on behalf of Mr D Waddington

Please note that a hard copy will follow in the post.


Please do not hesitate to contact me if you require any further information and it would be appreciated if you could confirm receipt of this e-mail.


Regards

Michael Barry

Michael Barry BA MSc MRTPI
 Planner
 For and on behalf of Carter Jonas LLP
 Tel: 01423 707807
 Fax: 01423 521373
 Mob: 07713 101652



 [Click here](#) to access the latest Carter Jonas newsletters and publications

 Please consider the environment - do you really need to print this email?

This email is confidential and intended solely for the use of the individual(s) to whom it is addressed. Any views or opinions presented are solely those of Michael Barry and do not necessarily represent those of Carter Jonas LLP. If you are not the intended recipient be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited.

Although the firm operates anti-virus programmes, it does not accept responsibility for any damage whatsoever that is caused by viruses being passed

Carter Jonas LLP is a Limited Liability corporate body which has "Members" and not "Partners". Any representative of Carter Jonas LLP described as "Partner" is a Member or an employee of Carter Jonas LLP and is not a "Partner" in a Partnership. The term Partner has been adopted, with effect from 01 May 2005, because it is an accepted way of referring to senior professionals.

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

18/12/2008

cc ref MB/
ur ref.
rect line 01423 707807
retary 01423 707822
ail Michael.barry@carterjonas.co.uk
te 17 December 2008

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

FAO T Heselton Esq

Dear Mr Heselton

Selby District LDF: Core Strategy Consultation on Further Options

We submit these comments on behalf of our client **Mr D Waddington** in respect of his land interests within Selby District.

We have been instructed to make representations to the emerging Core Strategy, as necessary including the Further Options document currently published for consultation.

Introduction

In making representations to the emerging Core Strategy, the main thrust of our comments focus upon the Council's housing aspirations for the district, in particular with respect to how housing is to be distributed throughout the district. Our client's particular interest is in the Settlement of Barlby/Barlby Bridge within the Selby AAP area.

A completed copy of the Council's Questionnaire and Comments Form is attached; however our main comments are provided within this letter.

Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

While we are broadly supportive of the process through which the Primary Villages have been selected we have some concerns over the diversity of settlements within this category and in particular Barlby/ Barlby Bridge which is a settlement that scores very well in all measures of sustainability and has a function far in excess of other named Primary Villages.

Property Consultants

Consequently we consider that the role of this settlement should be acknowledged in policy and it be upgraded to the role of a 'Service Settlement' alongside Tadcaster and Sherburn in Elmet.

In 2001 the parish of Barlby and Osgodby contained a population of 4,533 and contained a wide range of services and a local employment together with easy access to the major employment locations at Selby. The Analysis of travel to Work Patterns prepared as part of the evidence base reflects this.

PPS3 supports the forming of links between where people live and work and as such the focusing of development to Barlby/Barlby Bridge which is close to the main employment focus of to the of Selby which can be sustainably reached on foot, accords with this guidance.

Within the text of the Core Strategy it is stated that development to the settlement would be distributed through the Selby Area Action Plan area and while we welcome this, it remains important that Barlby/Barlby Bridge's role as a sustainable settlement in its own right is supported and it is designated a Local Service Centre.

Within this context we are satisfied that Barlby/Barlby Bridge is a sustainable settlement offers a logical and sustainable location for much of this growth and as such should be supported for increased development.

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1?

We have concerns over how it is proposed to accommodate housing within the Selby Area Action Plan Area and in particular to the suggested dependency on urban extensions to meet the requirements of Selby.

While we support the Allocation of the Olympia Mills site for housing and mixed uses we consider that rather than focus on large and unsustainable extensions the Council should focus development towards existing infilling and rounding off opportunities throughout the Selby Area Action Plan Area.

Such rounding off sites are far more deliverable and are capable of making a contribution towards housing requirements over the shorter term while their development offers greater flexibility than large scale extensions. RSS guidance offers strong support for proposals which can make use of existing infrastructure and that do not overload services and infrastructure and we consider that smaller sites which are more easily absorbed by existing infrastructure best fit in with this aspiration. The viability of developing these extensions in the current housing market also forms an important consideration.

In this context and having regard to the size of Barlby/Barlby Bridge and its function as an established service settlement, we consider that this is a settlement which is capable of sustainably accommodating a considerable proportion of Selby's housing requirement in a sustainable manner, and should be supported as such through the LDF.

b) In particular, should there be more or less housing in Tadcaster?

We have no comments to add.

c) In particular, should there be more or less housing in Sherburn in Elmet?

We have no comments to add.

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1= highest, 6 = lowest)

- (6) Site A – Cross Hills Lane
- (3) Site B – West of Wistow Road
- (2) Site C – Bondgate/Monk Lane
- (1) Site D – Olympia Mills
- (4) Site E – Baffam Lane
- (5) Site F – Foxhill Lane/Brackenhill Lane

Any other comments?

It is considered that the land towards the north of the village should become the primary focus for development. Sites here are most sustainable in the context of the settlement and the development of this land represents an opportunity to maximise regenerative benefits of development focusing on an area of the settlement which is highly sustainable in terms of jobs, services and public transport links, therefore we support the allocation of Olympia Mills.

We do not consider the identification of further strategic sites in Selby is appropriate however and ask that development is distributed throughout the Area Action Plan area to suitable infilling and rounding of opportunities as detailed above.

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

We consider that the Council should look to support limited housing growth in the smallest of settlements, furthermore policy supporting the conversion of rural buildings should be retained to help assist the process of rural diversification.

Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why.

We oppose the proposed change to affordable housing thresholds as set out presently.

While we accept that Selby like all other districts has a high level of affordable housing need we do not consider that there is adequate evidence to justify a reduction in affordable housing thresholds.

PPS3 states that 15 units is the indicative national site size threshold, however that Local Planning Authorities can set lower minimum thresholds where viable and practical (paragraph 29). Lowering thresholds in the manner proposed is an exceptional measure and when it is sought Local Planning Authorities must ensure that it is robustly justified. Although the Council has provided some justification we do not consider it to go far enough to underpin such changes.

We are concerned at the failure of the Local Planning Authority to test the viability of the proposed changes to affordable housing thresholds. If the proposed changes to these thresholds are carried forward into the finalised Core Strategy, the Local Planning Authority should test the proposals' viability or otherwise emerging policy would conflict with PPS3 guidance.

Q6 In order to help meet the need for affordable housing, do you agree with the use of commuted sums for housing schemes below the proposed thresholds? If not please explain why

As above we object steps to extract money from developers through commuted sums as in our response to question 5 the Council have failed to provide justification for such a measure.

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?

Site G - Olympia Park (land adjoining Selby Bypass) Site H - Burn Airfield

Have you any other suggestions?

We support the location of a strategic employment site at Site G, Olympia Park. This is a sustainable location for such a strategic extension close to the railway station, strategic road network, town centre and housing. A key premise of both the RSS and PPS3 is the linking of jobs and homes and we are of the view that this presents the most logical location for a major employment site.

Q8 Please tell us whether you agree or disagree with the following statements:

Property Consultants

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward.' (Disagree)
- B - 'Existing employment premises should be protected from redevelopment where there is evidence of market need.' (Agree)
- C - 'For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations.' (Agree)
- D - 'New housing development should be balanced with an appropriate level of new business development.' (Agree)

Any other comments?

We have no other comments to add at this point.

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

Provided it does not harm the viability of the major proposal in question we would have no difficulty supporting such a proposal. However we consider that a more appropriate and achievable policy would support a greater onus on building efficiency and sustainability.

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- Broadband
- Community Facilities x
- Cycle and walking infrastructure x
- Education x
- Green infrastructure x
- Health
- Public Realm x
- Rail and Bus infrastructure x
- Recreation open space x
- Recycling x
- Road infrastructure x

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

We support measures to create a more focused and sustainable green infrastructure, however this should be combined with a full appraisal of existing 'green' designations.

As part of the LDF the Council should commit to a full review of existing allocations and consider the revision of local landscape designations, and in particular the retention of 'Strategic Countryside Gaps' favored within the current Local Plan.

The retention of such non-statutory designations should undergo considered review as in many instances their designation has been broad brush and non-specific and has resulted in suitable potential development sites being left inappropriately constrained. A central tenant of PPS3 is that the best and most sustainable of development sites are delivered, this approach is a key motivation behind the SHLAA and the unnecessary constraining of land fails to fit in with this ethos.

Consequently we consider that rather than those unwieldy and artificial planning policy designations, the Council should favour the use of focused and high quality green infrastructure to assist the setting, image and connectivity of the district's landscape and settlements and as part of this process of reviewing existing designations.

Q12. Housing Mix

We consider that as per PPS3 the mix of housing delivered in Selby be of a type that meets the needs of the housing market as identified by a Strategic Housing Market Assessment.

We consider that this formative stage of the Core Strategy should be informed by such an assessment and we consider that as a matter of urgency the Council commence work on the preparation of such a document and call for its findings to be reflected in emerging housing policy.

Q13. Gypsies and Travellers

Of the options proposed we would be most supportive of option A. We consider that sites should be distributed across the district with particular focus on those locations of greatest need.

Q14. Site Details

We consider that sites should be of a type to allow the greatest flexibility. As such we would support Option B of those listed.

Q15. Travelling Showpeople

Accommodation should be put in the most sustainable locations which would be the main settlements.

Q16. General Comments

As part of the LDF we consider that the Council should undertake a review of land presently affected by landscape designations such as 'strategic countryside gaps'. Such a step is appropriate and would accord with the aspirations and the ethos of the SHLAA in ensuring the best possible sites come forward for development as failure to conduct such a review could result in the inappropriate constraining of suitable housing land need throughout the district.

Conclusions

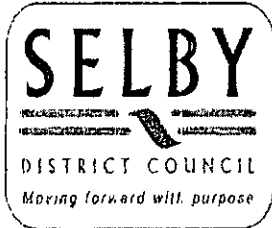
If you have any comments regarding the contents of this correspondence please do not hesitate to contact me.

Yours sincerely



MICHAEL BARRY BA (Hons) MSc MRTPI
Planner
For and on behalf of Carter Jonas LLP

Enc.



**Selby District Core Strategy
Questionnaire and Comments Form
for Consultation on Further Options
November 2008**

LDF LOCAL
DEVELOPMENT
FRAMEWORK

Office use
Ackd
ID No

Introduction

The Core Strategy document 'Consultation on Further Options' is available at www.selby.gov.uk, from 'Access Selby' and contact centres in Sherburn and Tadcaster, and all libraries in the District. The document is split into chapters on-line, and the questions below are accompanied by a note of the paragraphs that relate to each subject, for ease of completion. Should you wish to be sent a hard copy of the consultation document please contact the LDF Team, using the details on the last page.

The Council is particularly looking for comments on the following questions. You are welcome to add further comments relevant to the Core Strategy Further Options.

How to make comments:

- Please complete the form in dark ink (add extra sheets if you wish) and send to the address on the last page; or
- Fill in online at www.selby.gov.uk - follow the link from the Council's "In Focus" on the front page of the website.
- **Please submit your comments by 5pm on Thursday 18 December 2008.**
- Please provide your contact details below. *We do not accept anonymous comments.*

a) Personal details		a) Agent details if you are using one	
Name	MR D WADDINGTON	Name	
Organisation		Organisation	CARTER SQUARES LLP
Address	C/O AGENT	Address	13-15 ALBERT ST HARROGATE
Postcode		Postcode	HG1 15X
Tel		Tel	01423 707807
Fax		Fax	
Email		Email	01423 707807

michael.barry@carterjones.co.uk

Housing

Scale and Distribution of New Housing (see para 3.1 – 3.31)

Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

PLEASE SEE ENCLOSED LETTER

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1? **Yes/No**

PLEASE SEE ENCLOSED LETTER

b) In particular, should there be more or less housing in Tadcaster? **More/Less**

N/A

c) In particular, should there be more or less housing in Sherburn in Elmet? **More/Less**

N/A

Please explain why in each case.

Strategic Housing Sites at Selby (see para 3.32- 3.41)

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1= highest, 6 = lowest)

- (6) Site A – Cross Hills Lane
- (1) Site B – West of Wistow Road
- (2) Site C – Bondgate/Monk Lane
- (1) Site D – Olympia Mills
- (4) Site E – Baffam Lane
- (5) Site F – Foxhill Lane/Brackenhill Lane

Any other comments?

PLEASE SEE ENCLOSED LETTER

Managing Housing Supply (see para 3.42 – 3.45)

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

PLEASE SEE ENCLOSED LETTER

Affordable Housing (see para 3.46 – 3.59)

Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why.

PLEASE SEE ENCLOSED LETTER

Q6 In order to help meet the need for affordable housing, do you agree with the use of commuted sums for housing schemes below the proposed thresholds? If not please explain why

PLEASE SEE ENCLOSED LETTER

Economy**Strategic Employment Sites (see para 4.3 – 4.12)**

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?

Site G - Olympia Park (land adjoining Selby Bypass)

Site H – Burn Airfield

Have you any other suggestions?

PLEASE SEE ENCLOSED LETTER

Employment Land (see para 4.13)

Q8 Please tell us whether you agree or disagree with the following statements:

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward.' (**Agree/Disagree**) DISAGREE
- B - 'Existing employment premises should be protected from redevelopment where there is evidence of market need.' (**Agree/Disagree**)
- C - 'For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations.' (**Agree/Disagree**)
- D - 'New housing development should be balanced with an appropriate level of new business development.' (**Agree/Disagree**)

Any other comments?

N/A

Climate Change Issues (see para 5.1 – 5.5)

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

PLEASE SEE ENCLOSED LETTER

Sustainable Communities (see para 6.1 – 6.8)**Infrastructure Provision**

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- | | |
|-------------------------------------|----------------------------------|
| <input type="checkbox"/> | Broadband |
| <input checked="" type="checkbox"/> | Community Facilities |
| <input checked="" type="checkbox"/> | Cycle and walking infrastructure |
| <input checked="" type="checkbox"/> | Education |
| <input checked="" type="checkbox"/> | Green infrastructure |
| <input type="checkbox"/> | Health |
| <input checked="" type="checkbox"/> | Public Realm |
| <input checked="" type="checkbox"/> | Rail and Bus infrastructure |
| <input checked="" type="checkbox"/> | Recreation open space |
| <input checked="" type="checkbox"/> | Recycling |
| <input checked="" type="checkbox"/> | Road infrastructure |
| <input type="checkbox"/> | Other (please specify) |

Green Infrastructure

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

PLEASE SEE ENCLOSED LETTER

Housing Mix (see para 6.9 – 6.10)**Q12** Do you consider that

- a) More housing should be in the form of small dwellings (flats and terraced housing) **Yes/No**
or
b) More housing should be in the form of 3-4 bedroom family houses **Yes/No**

PLEASE SEE ENCLOSED LETTER

Gypsies/Travellers and Show People (see para 6.11 – 6.15)Gypsies and Travellers**Q13** In making appropriate provision for gypsies and travellers, do you agree or disagree with the following options (please mark your choice):

- (**Agree/Disagree**) Option A – New sites should be spread across the District.
(**Agree/Disagree**) Option B – New sites should be located in or close to the towns and primary Villages.
(**Agree/Disagree**) Option C – Expanding the existing sites

Q14 Do you agree or disagree with the following options:

- (**Agree/Disagree**) Option A – Sites should be sought that accommodate between eight and twelve pitches.
(**Agree/Disagree**) Option B – Individual pitches should be encouraged to allow flexibility and choice for gypsies and travellers distributed across the District.
(**Agree/Disagree**) Option C – A combination of A and B; one site of between eight and twelve pitches plus individual pitches.

Travelling Showpeople**Q15** The indications are that only limited provision is required within Selby District for travelling showpeople. If provision is required, should an area of search be:

- (**Agree/Disagree**) Option A – In or close to the towns of Selby, Tadcaster or Sherburn in Elmet?
(**Agree/Disagree**) Option B – In close proximity to the strategic road network (such as M62, A1, and A64)?

Please add any further comments you may have about the Core Strategy including the evidence contained in the Background Papers, which are also available on the Councils' website: (please add extra sheets)

PLEASE SEE THE ENCLOSED LETTER

Notification

Please tick the boxes below if you would like to be informed when

- The Core Strategy has been submitted to the Secretary of State for independent examination?
- The recommendations have been published of any person appointed to carry out an independent examination of the Core Strategy?
- The Core Strategy has been adopted?

Signed



Dated 17/12/08

If you have any questions or need some further information please contact the Local Development Framework Team on 01757 292063 or by email to ldf@selby.gov.uk.

Please return this form to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB

No later than 17.00hrs (5pm) on Thursday 18 December 2008.

victoria lawes

149

From: Adrian Hill [adrian@aahplanning.com]
Sent: 18 December 2008 10:41
To: ldf
Subject: Selby Site Representation
Attachments: Image (14).jpg; Image (8).jpg; Image (9).jpg; Image (10).jpg; Image (11).jpg; Image (12).jpg; Image (13).jpg; Selby LDF Report.pdf

Dear Sir/ Madam,

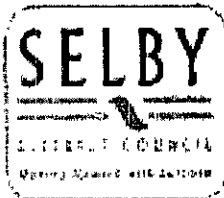
I have attached our representation for Site E, Baffam Lane. Please see enclosed questionnaire and supporting document. Could you please confirm that you have received this document?

If you have any questions please feel free to contact me,

Regards

Adrian

Adrian Hill
BA (Hons) DipTP MRTPI
2 Bar Lane
York
YO1 6JU
+44 (0)1904 780 955
www.aahplanning.com



**Selby District Core Strategy
Questionnaire and Comments Form
for Consultation on Further Options
November 2008**

LD LOCAL DEVELOPMENT FRAMEWORK

Office Use
Ackd
© No

Introduction
The Core Strategy document 'Consultation on Further Options' is available at www.selby.gov.uk, from 'Access Selby' and contact centres in Sherburn and Tadcaster, and all libraries in the District. The document is split into chapters on-line, and the questions below are accompanied by a note of the paragraphs that relate to each subject, for ease of completion. Should you wish to be sent a hard copy of the consultation document please contact the LDF Team, using the details on the last page.
The Council is particularly looking for comments on the following questions. You are welcome to add further comments relevant to the Core Strategy Further Options.

- How to make comments:**
- Please complete the form in dark ink (add extra sheets if you wish) and send to the address on the last page, or
 - Fill in online at www.selby.gov.uk - follow the link from the Council's 'In Focus' on the front page of the website.
 - Please submit your comments by 5pm on Thursday 18 December 2008.
 - Please provide your contact details below. We do not accept anonymous comments

a) Personal details		a) Agent details if you are using one	
Name	[Handwritten Name]	Name	[Handwritten Name]
Organisation	[Handwritten Organisation]	Organisation	[Handwritten Organisation]
Address	[Handwritten Address]	Address	[Handwritten Address]
Postcode	[Handwritten Postcode]	Postcode	[Handwritten Postcode]
Tel	[Handwritten Tel]	Tel	[Handwritten Tel]
Fax	[Handwritten Fax]	Fax	[Handwritten Fax]
Email	[Handwritten Email]	Email	[Handwritten Email]

Housing
Scale and Distribution of New Housing (see para 3.1 - 3.31)
Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

[Handwritten response]

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1? Yes/No

b) In particular, should there be more or less housing in Tadcaster? More/Less

c) In particular, should there be more or less housing in Sherburn in Elmet? More/Less

Please explain why in each case

Strategic Housing Sites at Selby (see para 3.32-3.41)

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1 = highest, 8 = lowest)

- (1) Site A - Cross Hills Lane
- (2) Site B - West of Wistow Road
- (3) Site C - Bondgate/ Monk Lane
- (4) Site D - Olympia Mills
- (5) Site E - Battam Lane
- (6) Site F - Fochill Lane/Brackenhill Lane

Any other comments?

Managing Housing Supply (see para 3.42 - 3.45)

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

Yes

Affordable Housing (see para 3.46 - 3.59)
Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why.

Q6 In order to help meet the need for affordable housing, do you agree with the use of committed sums for housing schemes below the proposed thresholds? If not please explain why.

Economy
Strategic Employment Sites (see para 4.9 - 4.12)

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?
Site G - Olympia Park (land adjoining Selby Bypass) Site H - Burn Airfield
Have you any other suggestions?

Employment Land (see para 4.13)

Q8 Please tell us whether you agree or disagree with the following statements:

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward. (Agree/Disagree)
- B - Existing employment premises should be protected from redevelopment where there is evidence of market need. (Agree/Disagree)
- C - For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations. (Agree/Disagree)
- D - New housing development should be balanced with an appropriate level of new business development. (Agree/Disagree)

Any other comments?

Climate Change Issues (see para 5.1 - 5.5)

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

Yes

Sustainable Communities (see para 6.1 - 6.8)**Infrastructure Provision**

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- Broadband
- Community Facilities
- Cycle and walking infrastructure
- Education
- Green infrastructure
- Health
- Public Realm
- Rail and Bus infrastructure
- Recreation open space
- Recycling
- Road infrastructure
- Other (please specify)

Green Infrastructure

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

no

Housing Mix (see para 6.9 - 5.10)

Q12 Do you consider that

- a) More housing should be in the form of small dwellings (flats and terraced housing) Yes/No
- or
- b) More housing should be in the form of 3-4 bedroom family houses Yes/No

Gypsies/Travellers and Show People (see para 6.11 - 6.15)Gypsies and Travellers

Q13 In making appropriate provision for gypsies and travellers, do you agree or disagree with the following options (please mark your choice):

- (Agree/Disagree) Option A - New sites should be spread across the District.
- (Agree/Disagree) Option B - New sites should be located in or close to the towns and primary villages
- (Agree/Disagree) Option C - Expanding the existing sites

Q14 Do you agree or disagree with the following options?

- (Agree/Disagree) Option A - Sites should be sought that accommodate between eight and twelve pitches.
- (Agree/Disagree) Option B - Individual pitches should be encouraged to allow flexibility and choice for gypsies and travellers distributed across the District.
- (Agree/Disagree) Option C - A combination of A and B; one site of between eight and twelve pitches plus individual pitches.

Travelling Showpeople

Q15 The indications are that only limited provision is required within Selby District for travelling showpeople. If provision is required, should an area of search be:

- (Agree/Disagree) Option A - In or close to the towns of Selby, Tadcaster or Sherburn in Elmet.
- (Agree/Disagree) Option B - In close proximity to the strategic road network (such as M62, A1 and A64)?

Please add any further comments you may have about the Core Strategy including the evidence contained in the Background Papers, which are also available on the Council's website. (please add extra sheets)

Large empty rectangular box for providing comments.

Notification

Please tick the boxes below if you would like to be informed when

- The Core Strategy has been submitted to the Secretary of State for independent examination?
- The recommendations have been published of any person appointed to carry out an independent examination of the Core Strategy?
- The Core Strategy has been adopted?

Signed _____ Dated 10/12/08

If you have any questions or need some further information please contact the Local Development Framework Team on 01757 292083 or by email to ldf@salby.gov.uk

Please return this form to the LDF Team, Development Policy, Selby District Council, Civic Centre, Fortholme Road, Selby, North Yorkshire, YO8 4SB
No later than 17.00hrs (5pm) on Thursday 18 December 2008.

Guidance on Transport Assessment



Chapter 6: The link with the development plan making process

- A1. The development plan, or similar (PDC, PPS or other) represents the requirements for development, plan rules, standards of performance and resource allocation.
- A2. The development plan and other strategic policies and documents form part of the development plan and other strategic policies and documents.
- A3. Where the development plan is subject to a review, the development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A4. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A5. It will be required for the planning to be done in a way that is consistent with the requirements of the development plan, or other relevant policies and documents.

Regional and local planning framework

- A6. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A7. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A8. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A9. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A10. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A11. It may be possible to update the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A12. A development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A13. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A14. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A15. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A16. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A17. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A18. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A19. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.
- A20. The development plan should be updated to reflect the requirements of the development plan, or other relevant policies and documents, and the requirements of the development plan, or other relevant policies and documents.



AAH Planning Consultants

**AAH PLANNING CONSULTANTS
PLANNING & DEVELOPMENT
CONSULTANTS**

**PLANNING APPRAISAL REPORT ON BEHALF OF THE
YORK DIOCESAN BOARD OF FINANCE LIMITED**

**REPRESENTATION FOR BAFFAM LANE SITE, SELBY
SELBY STRATEGIC GROWTH – URBAN EXTENSION
AND STRATEGIC EMPLOYMENT SITE OPTIONS**

Our Reference; AAH/00412/08

December 2008

AAH Planning Consultants

CONTENT

1.0	Introduction	Page 3
2.0	The Site Details	Page 4
3.0	Consideration	Pages 5 – 7
4.0	Constraints	Pages 8 – 10
5.0	Conclusion	Page 11

Checked	AAH	
---------	-----	--

1.0 Introduction

1.1 This report has been prepared by AAH Planning, Town Planning and Development Consultants, at the request of The York Diocesan Board of Finance Limited.

1.2 This report seeks to identify the planning merits, impact on existing infrastructure and service provision on the site identified as 'Site E' in the Selby Further Options Report, Baffam Lane, Selby. Each of the key planning considerations will be addressed in turn. Reference made to paragraph 3.40 of the Selby District Council Local Development Framework, Core Strategy Development Plan Document, Further Option Report, as this highlights the advantages and disadvantages of the areas to be considered for allocation, Baffam Lane site being one of these.

1.3 The site extent and location, is shown outlined in red on the site location plan at Appendix 1.

2.0 Details of the site

Site E – Baffam Lane

2.1 The site, which extends approximately to 22 hectares, comprises underused grassland and access to the Selby Canal. The built up southern suburbs of Selby are sited to the north and the built up area of Brayton is to the south. The A19 passes to the west of the site and the Selby Canal borders the site to the east, which has a pedestrian walkway, which follows the canal, and provides access to the northern suburbs of Selby and the town centre. Appendix 2 illustrates the sites proximity to local services and infrastructure.

3.0 Consideration

3.1 With the 'Consultation on Further Options' document, November 2008 the planning advantages of the Baffam Lane site have been identified in three bullet points, which are set out below.

- Could create opportunities to open the canal up for leisure and amenity/landscaping purposes as part of the Selby's green infrastructure network.
- Recognisable physical limits to development.
- Low flood risk.

3.2 Each of these points will be addressed in more detail, assessing the planning merits in respect to regional and national planning policies.

Opportunities to utilise the Canal for recreation and tourism

3.3 The first benefit, if the site was to be allocated, would be the potential improvements and opportunities created in and around the Selby Canal. Improved access and facilities around this area would regenerate the area, not only for future residents but for the town and district. Planning Policy Guidance (PPG) 21: Tourism, encourages regeneration, which in turn increases tourism opportunities. PPG21 states that, 'the planning system should facilitate and encourage development and improvement for tourist provision, while respecting the environment'. By creating improved access, site allocation could present an opportunity for further redevelopment and regeneration along and around the canal within the urban area, in accordance with PPS1: Sustainable development, PPS3: Housing, and PPG21.

3.4 PPG17: Planning for open space, sport and recreation, encourages high quality well maintained public open spaces. The policy states that 'Local Authorities should seek to improve recreational rights of way, to seek opportunities to provide better facilities for walkers, cyclists and

AAH Planning Consultants

horse riders'. As there is already a footpath running adjacent to the canal, any improvements around this area would accord with PPG17.

3.5 Regional guidance, as contained within the Yorkshire and Humber Regional Spatial Strategy to 2026 (YHRSS) identifies, in policy E6, that sustainable tourism is integral to contributing to the local economy. It may be concluded that any canal improvements that would encourage tourism would have some associated economical benefits for the community.

3.6 In conclusion, by developing this site, as well as contributing to Selby's Green Infrastructure Network, it will also open a number of planning and regeneration opportunities to improve the canal area. This would accord with general planning policies and principles of regeneration and renewal. There are regional and national examples of potential environmental and economic benefits that can result from canal restoration projects, which should inspire potential regeneration schemes.

Site parameters

3.7 The second advantage of the site refers to the area, which has recognisable limits with existing development to the north and south, the canal to the east and A19 to the west. When considering regional and national planning objectives, it is important to prevent urban sprawl, as identified in PPS7: Sustainable development in rural areas. It is important to concentrate development along existing public transport corridors and service nodes. The geographical constraints of the site ensure that the land is used efficiently and would make use of existing infrastructure, in accordance with PPS1 and PPS3. These national planning policies recognise the need to build housing in sustainable locations, creating sustainable patterns of development.

Area in a Low Flood Risk

3.8 PPS25 identifies that, 'planning policies on development and flood risk are to ensure that flood risk is taken into account at all stages of the planning process, to avoid inappropriate development in areas at risk from flooding'. The risk of flooding should be considered at all stages,

AAH Planning Consultants

including the preparation of core strategy policies, as part of the LDF preparation period. Preference to areas in low risk should be of paramount importance, in accordance with national guidance. Regional guidance as contained in the YHRSS presents further guidance in policy ENV1, which directs development to areas of low risk priority. Considering these requirements, Site E is an attractive site in planning terms, and should be preferred over and above sites which have the majority of the area in zone 2 areas.

Accessibility

3.9 An additional advantage to the site is the proximity to local services and public transport, in accordance with policies PPS1 and PPS3. The map in Appendix 2 highlights the sites close proximity to services. This includes;

- Schools
- Supermarkets
- Town Centre
- Hospitals
- Colleges
- Churches

The site is considered sustainable, as identified in PPS1, by being available to these local services.

4.0 Constraints

4.1 Also included in the report for Further Options, paragraph 3.40 identifies three potential constraints for the site. These constraints are set out below and will be considered in this part of the report:

- Forms a strategic countryside gap between Selby and Brayton, which is currently protected from development by Policy SG1 in the Selby District Local Plan.
- Western part of the site falls within the Brayton Conservation Area and development would impact on the views of St Wilfred's (Grade 1 listed) Church.
- Eastern part of the site would impact on the environs of Selby Canal.

Strategic Gap

4.2 The first constraint refers to the loss of the strategic gap. In the Local Plan, the strategic gap policy is clarified. It identifies that one of the principle aims of the strategic gap policy is to ensure access to the countryside, recreation opportunities and to create wildlife corridors. It is clear from a map (Appendix 1 and 2) that the existing residents of Selby and Brayton would maintain access to countryside to the east and west, as only a comparatively small area would be developed. All residents would still be within walking distance of the open countryside, and potentially improved canal area. The improvements to the canal area could encourage more wildlife in the locality and increase recreational activity, both in accordance with the underlying aims of the strategic gap policy.

4.3 PPS3 identifies what requirements would make a site suitable for development as 'good access to jobs, key services and infrastructure'. From a planning perspective, the site satisfies criteria in PPS1 and PPS3, providing any development uses sensitive design and layout, respecting

AAH Planning Consultants

the character and amenity of adjoining occupiers. PPS7 also advises against local landscape designation, preferring a criteria based approach to local policies that are specifically targeted at the factors which require protection. The blanket gap policies, and overriding benefits to development, make a strategic gap policy obsolete.

Brayton Conservation Area

4.4 The second constraint refers to the impact the proposal would have upon the Brayton Conservation area and views on St Wilfred's Church. With regard to conservation areas, PPG25: Planning and the historic environment, states that conservation areas should not take 'the form of preventing all new development. The emphasis will generally need to be to controlled and positive management of change'. In paragraph 4.17 it continues, 'many conservation areas include gap sites, or buildings that make no positive contribution to, or indeed detract from, the character or appearance of the area; their replacement should be a stimulus to imaginative, high quality design, and seen as an opportunity to enhance the area'. This clearly identifies that suitable development in conservation areas may be a positive feature. As part of any subsequent applications submitted to the authority special care and attends should be taken with the design of any part of the site that lies within the Conservation Area.

4.5 In terms of the views of the listed church, it is maintained that to the north, south and west the views of the church would be maintained, particularly from vehicular traffic north and southbound along the A19. The views from the east would be interrupted from existing dwellings outside of the conservation area. Planning law does not make provision to protect views. It is more important from a planning perspective that the setting of the listed building is protected. The church occupies a prominent position within the open land between Selby and Brayton. This 'isolated' setting is important to the character of the building and foreground of open space, which wraps around the church, and which would be retained to reserve the historic setting and maintain its character and appearance.

Impact to the Selby Canal

4.6 The third reason refers to the impact potential development would have upon the environs of the Selby Canal. Any development on the site would have to satisfy ecology and environmental objectives as set out in PPS9: Biodiversity and geological conservation. This states that the aims are to 'enhance biodiversity in green spaces and among developments so they are used by wildlife, and valued by people'. It continues, 'ensuring developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment.' With a general presumption that development will improve the general environment, it may be considered an advantage to improve the canal area, both from a biodiversity perspective and the appearance of the area. Any development may also include suitable professional advice and guidance as how to best preserve the local environment and improve biodiversity.

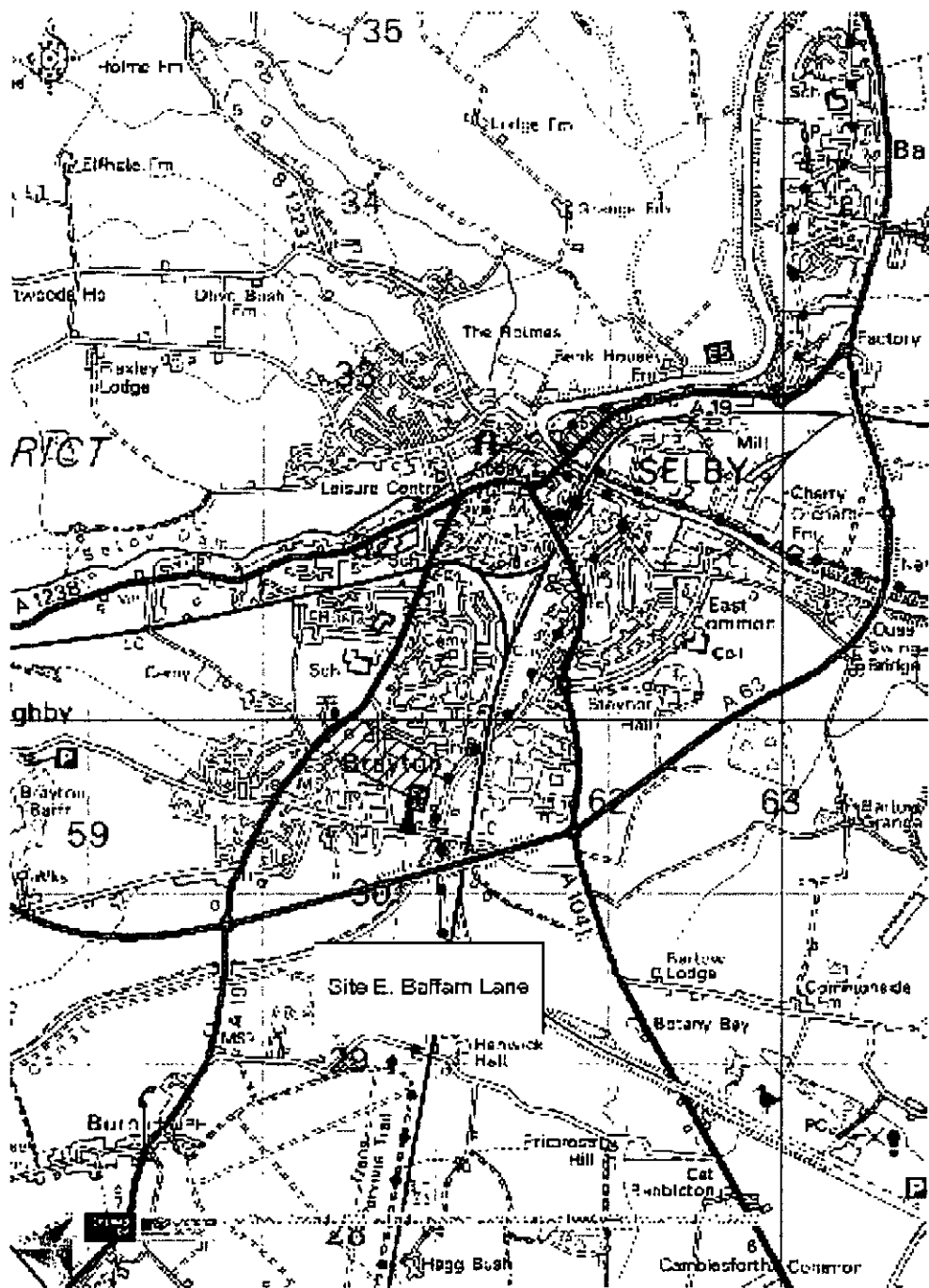
5.0 Conclusion

5.1 The Local Development Framework Future Options Report for Selby has to identify Greenfield sites for development in order to meet regional targets set by the Yorkshire and Humber regional plan. Both national and regional policies seek to concentrate development around the principle settlements, which is Selby within the plan area, recognising a need to extend existing urban areas, where good transport links are available.

5.2 The site provides opportunities to develop on a low flood risk area, in accordance with PPS25, and to redevelop part of the Selby Canal. The potential redevelopment could act as a stimulus for further development along the canal banks. The site area would also provide an opportunity for a visually and physically contained urban extension to Selby.

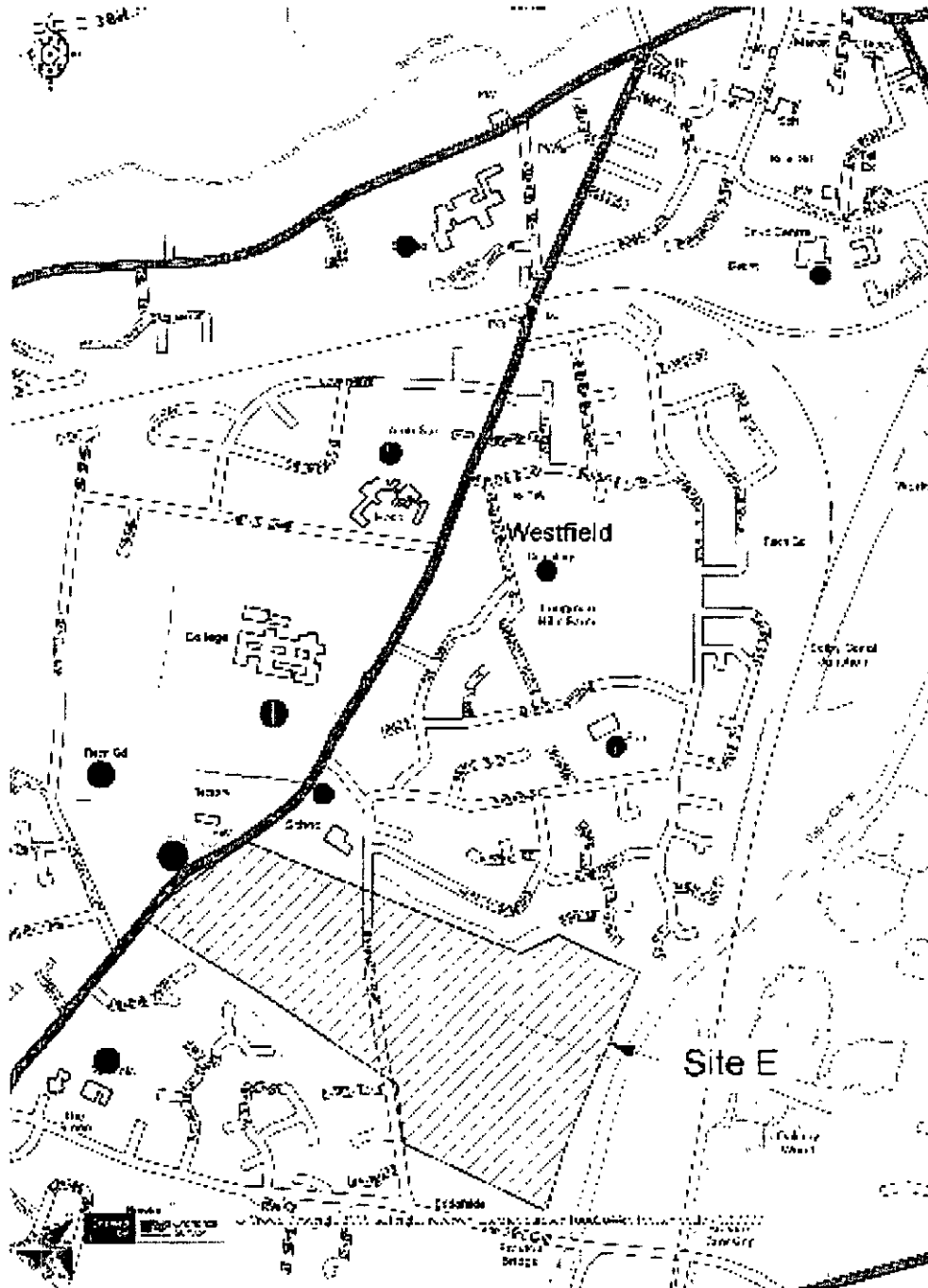
5.3 The development of the Baffam Lane site will meet the objectives of both regional and national planning guidance, and contribute to the housing provision, providing significant community and planning benefits.

Appendix 1









Baffam Lane Site

Appendix 2



Key – Appendix 2

	Public Transport
	Education
	Church
	Shopping centre/ Supermarkets
	Health care/ Civic Centre
	Cemetery

victoria lawes

150

From: D DUMBELL [REDACTED]
Sent: 18 December 2008 16:58
To: terry heselton
Cc: victoria lawes
Subject: Core Strategy

Dear Terry,

The Core Strategy was considered at the recent Meeting of the Parish Council and I enclose comments as follows :

With regard to Olympia Park, the Parish Council has no objections to redevelopment of the roadside (A19) frontage but has reservations concerning development of the land to the rear, on the other side of the Selby to Hull railway line for 500 + dwellings. This part of the site has valuable and well used recreational facilities, the Parish Council believes that job creation should precede significant housing development.

Yours

Dianne Dumbell

Clerk
Barlby and Osgodby PC

victoria laws

151

From: Ali, Zulfiqar [zulfiqar.ali@environment-agency.gov.uk]
Sent: 18 December 2008 17:00
To: ldf
Subject: Core Strategy Response

For the attention of Terry Heselton.

Please find enclosed the Environment Agency's response to your Core Strategy Further Options Report.

Best Wishes

Zulfiqar Ali
Planning Liaison Officer

Tel: 01904 822 626 (Internal 728 2626)
Email: zulfiqar.ali@environment-agency.gov.uk

Environment Agency
Coverdale House
Aviator Court
Clifton Moor
York YO30 4GZ

Part of the Environment Agency's Yorkshire and North East Region



**ENVIRONMENT
AGENCY**

Selby District Council
Environmental Services
Civic Centre Portholme Road
Selby
North Yorkshire
YO8 4SB

Our ref: DN/2006/000341/CS-

01/PO1-L01

Your ref: FP/L140

Date: 17 December 2008

For the attention of Terry Heselton

18/12/2008

Dear Sir

Core Strategy Development Plan Document Further Options Report

Thank you for the opportunity to comment on your Core Strategy Further Options Report Stage which was received by the Agency on the 10 November 2008.

In developing the further options for Selby LDF Core Strategy, the council must have regard to the strategic planning context and in particular the Regional Spatial Strategy (RSS) and emerging RSS review.

Our main concern with your core strategy further options stage is the lack of reference to the considerations of the environment but also the application of the flood risk Sequential and Exception Tests in accordance with PPS 25 (Development and Flood Risk). The core strategy fails to comply with PPS 25. We feel that this is not consistent with national policy (PPS 25) and the Yorkshire and Humber Regional Spatial Strategy (RSS) and could lead to a soundness issue. A significant spatial issue for the core strategy is the potential for surface water flooding (as illustrated in the 2000 floods). The strategic sites as proposed within your core strategy are at a high risk from flooding. Your Strategic Flood Risk Assessment (SFRA) must consider in detail if these sites are acceptable for development. In its current format with no Level 2 SFRA in place we would object to any development within the majority of these strategic sites.

We were consulted in 2005 on your core strategy issue and options stage. The Agency responded with some comprehensive comments advising Selby District Council of the lack of policies and very little reference to environmental issues and in particular due regard to flood risk. Unfortunately this remains the case with your further options report. Please clarify to us how our previous comments have been taken on board to influence this further options report. The core strategy in its current form fails to recognise the environmental issues facing the Selby District. As a result this could lead to a soundness issue it could further lead to the failure to comply with the Yorkshire and Humber Regional Spatial Strategy Policies YH1 policy and policy YH2. It is important to note that Policy ENV1 (Development and Flood Risk) of the Yorkshire and Humber Regional Spatial Strategy states:

POLICY ENV1: Development and flood risk

A The Region will manage flood risk pro-actively by reducing the causes of flooding to existing and future development, and avoid development in high flood risk areas where possible.

B Allocation of areas for development will follow a sequential approach and will be in the lowest risk sites appropriate for the development (identified by Strategic Flood Risk Assessments).

C Flood management will be required to:

1. Facilitate development in Selby where there is little development land available outside high flood risk zones, provided the sequential approach has been used to inform decisions regarding flood risk`
2. Protect parts of the strategic transport network, especially the Selby transport corridors
3. Provide flood storage, habitat creation and managed realignment in areas around river corridors as required

4. Provide positive land management for flood alleviation.

Strategic Flood Risk Assessment (SFRA)

In order to provide a document based on a robust and credible evidence base the SFRA must inform the decision making process in determining the spatial element of the core strategy. The Agency is working closely with Selby District Council to compile the Level 2 study. Selby District Council has completed the Level 1 SFRA.

Key Issues

Paragraph 3.19 Primary Villages

Your core strategy further options report in defining the criteria for Primary Villages refers to the relative sustainability of settlements. The further options report considers amongst other things the location of services including for example a doctor's surgery and public transport accessibility as measures of sustainability. We feel that in addition to these defining characteristics it is also imperative that environmental factors are considered. No reference is made to the fact that large areas of these primary villages are at risk from flooding or are located within Source Protection Zones (SPZ) or within close proximity to Major Aquifers. In addition your core strategy fails to address the issue of water resources. Policy ENV2 of the Yorkshire and Humber Regional Spatial Strategy states:

POLICY ENV2:Water resources

The Region will safeguard water resources and encourage water efficiency. Plans, strategies, investment decisions and programmes should:

A Ensure water resource capacity and provide a reliable and efficient supply of drinking water to settlements throughout the region whilst safeguarding the integrity of internationally important biodiversity sites and the wider environment.

B Maximise water efficiency measures, and in particular avoid depleting the Sherwood Sandstone aquifer in Selby.

We would suggest that this could be achieved by locating development outside areas where these zones exist. If water abstraction is limited then further development in these areas identified by your core strategy namely the primary villages and the strategic sites would exacerbate this problem. Your core strategy in its current format fails to address these important environmental concerns. In order to achieve a sound level of sustainability for these primary villages the issues above need to be addressed. I would refer you to the key principles as set out in PPS 1.

The 20 villages selected must consider the issue of flood risk. The majority of these settlements lie within flood zone 2 & 3. Where this is the case, strategic policies and any new development proposed must undergo a Sequential Test and if necessary the Exception Test should be applied in accordance with PPS 25. Paragraph 16 in PPS 25 is clear that 'LPAs allocating land in DPDs for development should apply the Sequential Test to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.' If, and only if, following application of the Sequential Test, it is not possible to develop sites in lower flood risk zones, then the Exception Test can be applied as detailed in paragraphs D9-14 of PPS 25

Furthermore, parts of these areas are designated as Source Protection Zones for protection of vulnerable groundwater. We have dealt with many developments within these Primary Villages and have previously highlighted the issues of the groundwater vulnerability. We

would therefore have serious concerns with any potentially polluting development in these areas. Several of the areas highlighted for future development are located within groundwater SPZ. These zones are defined so that land use can be managed to protect groundwater public water supplies.

We have published a guidance document called Groundwater Protection: Policy and Practice (GP3) which deals with the Agency's approach to development in SPZ from a guidance and legislative context.

We would have major concerns to the following developments in SPZ Zone 1 areas:

- Any waste management activity requiring a Waste Management Licence or a PPC Permit
- Any new discharge of sewage effluent, trade effluent or storm sewage to ground
- Installation of cesspools
- The use of Sustainable Urban Drainage schemes (SUDs) draining roads, parking areas and public / amenity areas
- Manure & slurry storage
- Any development which will physically disturb the aquifer

In addition, much of the Selby District is located on "Major Aquifers" which contains a significant water resource which must be protected. In the context of brownfield development, it is critical that developers are directed towards PPS 23 in their assessment of potential ground contamination, and to ensure their development does not allow contamination of the aquifer below.

We would also seek to encourage development which accounts for sustainable water use. Furthermore while we agree that many factors need to be considered in accommodating growth it appears that the adequacy of the sewerage infrastructure in capacity and standard of treatment have not been considered. One factor that would help surface water quality issues would be a presumption of new development in settlements that have adequate secondary treatment infrastructure associated with mains drainage.

Proposed Distribution of Housing

We would favour any option which has a low probability of flooding taking into account the principles of PPS 25. In addition the distribution of housing should also take into account the Agency's Groundwater Protection Policies taking on board the recommendations as set out in PPS 23. Furthermore Biodiversity principles as stipulated within PPS 9 must be adhered to. The proposed distribution of housing must be in conformity with the Yorkshire and Humber Regional Spatial Strategy with your core strategy taking account of the environment and sustainable development implications for the Selby District. In its current form your core strategy fails to address these important issues. Please note that figures stated in Table 1 distributions of development options may be affected as a result of the findings of the SFRA Level 2. Findings of the SFRA could potentially have an impact on the housing figures as defined in Table 1. We would refer to our comments about being consistent with regional and national policy.

Strategic Housing Sites

The Sequential Test, and where required, the Exception Test will need to be applied to all these sites before any of them can be brought forward. We know it is Selby's intention to scrutinise a number of sites further through their SFRA. At a national level PPS 25 aims to ensure that flood risk is taken into account at all stages of the planning process to avoid

inappropriate development in areas at risk of flooding and to direct development away from the highest risk. The majority of the identified options for strategic housing sites are at high risk as identified below. As a result it is evident that these sites have not been subject to the Sequential Test process and therefore contrary to national policy, which in turn will render the core strategy unsound. My detail comments on each site are described below:

Site A Cross Hills Lane

Flood Risk

It is correctly identified that the site is at flood risk. The recent Selby Dams study that the Environment Agency commissioned has shown that the site is at greater risk than previously shown. As a result, the scope for development of this site is more limited. Given the nature of the flood risk, it would be difficult to mitigate the effects by building measures into any development. Similarly, if secondary defences were proposed, as suggested in the text, displaced flood flows could cause greater flood risk to adjacent parties. It is proposed that the flood risk to this site is scrutinised in greater detail in the Selby Strategic Flood Risk Assessment Level 2.

Biodiversity

Cross Hills Lane is shown as encroaching upon the river corridor of Selby Dam and includes a new river crossing, which we assume is a road link. The section of Selby Dam within the development area is subject to prolonged flooding and was under water for several weeks over the summers of 2007 & 8. Extensive and prolonged flooding is even more likely in winter. The watercourse is known to support a large water vole population (a species which is now fully protected under the Wildlife & Countryside Act 1981). We strongly suggest that any development is confined to the northern part of this area and that very serious consideration is given to the drainage issues from any development. The river corridor should be developed as a "Strategic Countryside Gap" and managed for wildlife and public enjoyment of the same.

Site B Land West of Wistow Road

Flood Risk

The Selby Dams study has further refined our understanding of the flood risk on this site. Most of the site is still shown to be within flood zone 1 (low risk). An area of higher risk exists along Cockret Dike. Again, if secondary defences were proposed, as suggested in the text, displaced flood flows could cause greater flood risk to adjacent parties.

Biodiversity

We have some records of water vole present in this area, thus mitigation measures must be considered during any development plan.

Site C Bondgate/Monk Lane

Flood Risk

Flood risk is a significant restraint on this site, we would strongly advise against this site coming forward for development. The Selby Dams study has shown that a large part of the site is liable to flood risk. During a flood event on the River Ouse, Holmes Dike becomes flood locked, once the Wistow Lordship flood storage area is used. As a result, flood waters are stored on the majority of this site. Any development here would be at a significant risk as would existing development from the displacement of flood waters. A number of properties have suffered flooding historically. An additional risk would be from a breach in the flood storage area barrier bank. Any such occurrence would have very serious implications for any new development and its occupants, as the site would be potentially subjected to deep, fast flowing water.

Biodiversity

We have records indicating water voles in this area. This site requires further investigation as brown rats are also present in large numbers.

Site D Olympia Park (Olympia Mills)

Flood Risk

The report correctly identifies that the site is at a high risk of flooding. Further understanding of the risk is required and discussions are ongoing about providing this in the Selby SFRA Level 2.

Site E Baffam Lane & Site F Foxhill Lane/Brackenhill Lane

Flood Risk

The report correctly identifies that these sites are at a low risk of flooding. Therefore, sequentially they are more preferable in terms of flood risk than any of the other proposed sites.

Biodiversity

we have no ecological data for this area, but parts of the adjoining Selby Canal are designated as a SINC and British Waterways should be consulted on the ecology of the canal and its corridor.

Site G Olympia Park (Land adjacent to Selby By-pass)

Flood Risk

The report correctly identifies that the site is at a high risk of flooding. Further understanding of the risk is required and discussions are ongoing about providing this in the Selby SFRA Level 2.

Site H Burn Airfield

Flood Risk

The report makes reference to determining the extent of functional floodplain in this location. It is likely that further study will demonstrate that the site is not within functional floodplain. However, part of the site would still remain within Flood Zone 3 (high risk). It may be possible to mitigate against flood risk in this location given the likely nature of the flood risk.

Biodiversity

Part of this area is a SINC, but we have no other ecological information on the site.

Selby District is noted for large surviving populations of water vole in the ditches and drains of the area, and this includes some that might be considered as far from ideal habitats. Great crested newts are often found in local ponds and still water bodies. All proposed developments should be preceded by surveys for these and other protected species and where needs be mitigation proposals made.

There is a problem with Japanese knotweed in some parts of Selby. This is an invasive species and it is often spread by soil movements from sites where the plant is already present. It is an offence to cause this plant to spread and civil actions may result if it is allowed to spread from a site to neighbouring land. Control measures need to be undertaken well in advance of any construction work. Please contact our Biodiversity Section for further guidance on how this could be achieved and eradicated through your LDF process via a suitable policy.

Groundwater & Contaminated Land issues for the Strategic Sites

All eight sites fall within the embargo area of the Selby Sherwood Sandstone Aquifer where no water is available for abstraction. This means that if any additional groundwater

abstraction licences were sought as part of the proposed developments, there would be a presumption against the Environment Agency granting them.

The sites are all located on the Sherwood Sandstone Principal (Major) Aquifer. This important aquifer is used extensively in the Selby area. It is therefore vital to protect it from any risk of contamination.

Environment/Natural Resources/Climate Change

In Para 5.1 you make reference to the fact that environment policies should be consistent with the principles established in regional and national policy. Unfortunately no mention of PPS 1 is made which prescribes the key principles of sustainable development. Furthermore PPS 25 and PPS 23 must be acknowledged within this section. We support Selby District Council's Biodiversity Action Plan as advocated within this paragraph, however we are disappointed that very little focus has been placed within this document on biodiversity concerns and issues for the district. We would support development that contributes more positively to the enhancement of biodiversity.

Para 5.4 - We look forward to commenting in detail with regards to the policies proposed. We feel however that policies surrounding, energy conservation, renewable energy and flood risk, biodiversity, water resources and groundwater management be discussed in detail within your core strategy. Unfortunately no evidence has been presented to show that these policies have been developed within this further options report. Your core strategy further options report has not been accompanied by a Sustainability Appraisal. We reserve the right to amend our consultation response once we receive this information.

Climate Change

The core strategy should also consider the impacts of climate change. We strongly recommend the efforts towards preventing and adapting the effects of climate change be reflected within this document as emphasised by PPS 1 & PPS 25.

The Agency would strongly suggest that where development is proposed in flood zone 1 flood risk assessments taking into account pluvial flooding be considered. Wherever appropriate the use of SUDs is advocated. Sustainable drainage is a process for achieving integrated surface water drainage design with the objectives of:-

- reducing the flood risk from development within a river catchment;
- minimising diffuse pollution arising from surface water runoff;
- minimising environmental damage, e.g. bank erosion, and damage to habitats;
- maintaining or restoring the natural flow regime of the receiving watercourse;
- maintaining recharge to groundwater subject to minimising the risk of pollution to groundwater;
- achieving environmental enhancements, including improvement to wildlife habitats, amenity and landscape quality;
- minimising the amount of surface water runoff and infiltration entering foul and surface water sewerage systems.

Request for a meeting

We would welcome the opportunity to meet with yourselves to discuss any of the issues raised here and work with you to resolve them. Please contact me to agree a convenient time to meet.

Yours faithfully

Mr Zulfiqar Ali
Planning Liaison Officer

Direct dial 01904822626

Direct fax 01904822649

Direct e-mail zulfiqar.ali@environment-agency.gov.uk

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.

We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

If we have sent you information and you wish to use it please read our terms and conditions which you can get by calling us on 08708 506 506. Find out more about the Environment Agency at www.environment-agency.gov.uk

victoria lawes

152

From: geoff willows [REDACTED]
 Sent: 18 December 2008 17:06
 To: ldf
 Subject: Re: Core Strategy Development Plan Document (Consultation)

On 12/18/08, geoff willows [REDACTED] wrote:

Geoff Willows,
 25 Northlands,
 Adwick-le-Street,
 Doncaster,
 DN6 7AX

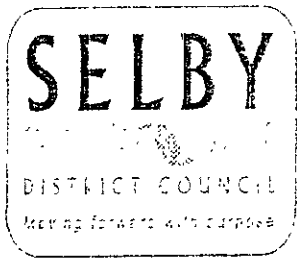
Circuit Planning - Jehovah's Witnesses

[REDACTED]

Firstly may I congratulate you on a comprehensive and informative questionnaire. I would like to comment on Q8A
 I agree with this proposal. Often these undeveloped sites have proved to be suitable for community or "faith groups" usage, particularly if located near residential areas.

Q10 "Community Facilities" With an ever increasing problem of drug and alcohol abuse and now even gang warfare in some areas, the need for genuine communication with younger members of our society is vital in helping with moral guidance and giving them a "purpose in life" to obtain a "sustainable well integrated society".

"Any Further Comments" In any sustainable civilised society we would hope that provision is made for "faith groups" to build places of moral and social education. A place where the "meeting of minds" between generation groups can meet to resolve many of the increasing social behavior problems. We have found in our own church that the problems of drug and alcohol abuse, anti-social behavior does not exist. We endeavour to involve as many people as possible in a Bible education work, believing this can help in developing a sustainable community.



**Selby District Core Strategy
Questionnaire and Comments Form
for Consultation on Further Options
November 2008**



Office use
Ackd
ID No **153**

Introduction
The Core Strategy document 'Consultation on Further Options' is available at www.selby.gov.uk from 'Access Selby' and contact centres in Sherburn and Tadcaster, and all libraries in the District. The document is split into chapters on-line, and the questions below are accompanied by a note of the paragraphs that relate to each subject, for ease of completion. Should you wish to be sent a hard copy of the consultation document please contact the LDF Team, using the details on the last page.
The Council is particularly looking for comments on the following questions. You are welcome to add further comments relevant to the Core Strategy Further Options.

- How to make comments:**
- Please complete the form in dark ink (add extra sheets if you wish) and send to the address on the last page; or
 - Fill in online at www.selby.gov.uk - follow the link from the Council's "In Focus" on the front page of the website.
 - Please submit your comments by 5pm on Thursday 18 December 2008.
 - Please provide your contact details below. *We do not accept anonymous comments*

a) Personal details		a) Agent details if you are using one	
Name	JACK DAVIE	Name	
Organisation		Organisation	CHAIR OF WHITLEY PARISH
Address	THE CHASE DOWCITS/ER ROAD HIGHFIELD WHITLEY, Nth Yorks DN14 0JW	Address	MEMBER & RESIDENT OF WIMBORSLEY PARISH RESIDENT OF THE SDC AREA SINCE 14 NOV 1964.
Postcode	DN14 0JW	Postcode	
Tel	[REDACTED]	Tel	
Fax		Fax	
Email	[REDACTED]	Email	

Housing
Scale and Distribution of New Housing (see para 3.1 – 3.31)
Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why

No. 100% Increase in housing needed south of Brayton, infasticular south of M62.
Then the villages could obtain GAS supply, to reduce cost of energy. Sherburn & Tadcaster should not be increased.
CONCERNATE OR MAKING SELBY HIGH CLASS.

INCREASE LEISURE & SPORT / BETTER STOPS - GOOD PARKING BETTER TRANSPORT LINKS

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1? ~~Yes~~/No

affordable housing should be throughout SDC - better planning needed - No 3 story - all must have reasonable size garden - so vegetable can be grown.

b) In particular, should there be more or less housing in Tadcaster? ~~More~~/Less

c) In particular, should there be more or less housing in Sherburn in Elmet? ~~More~~/Less

Please explain why in each case. Tadcaster and Sherburn are both becoming overloaded - SD area has plenty of other areas needing development - South of BRAYTON.

Strategic Housing Sites at Selby (see para 3.32- 3.41)

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1= highest, 6 = lowest)

- () Site A - Cross Hills Lane
- () Site B - West of Wistow Road
- () Site C - Bondgate/Monk Lane
- () Site D - Olympia Mills
- () Site E - Baffam Lane
- () Site F - Foxhill Lane/Brackenhill Lane

} Limited housing / must include gardens - instead of future slums.

Any other comments?

International businesses required in Selby Town - to improve income levels of ^{SDC} residents, most people shop in York, Doncaster & Leeds - IMPROVE SELBY TOWN - turn it into a CITY.

Managing Housing Supply (see para 3.42 - 3.45)

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

Better planning needed to SDC, to improve lifestyle, Sherburn & Tadcaster should not be extended.
Communities south of Brayton pay the same Council Tax, but receive poor value for money paid - better facilities required in the so called NON-PRIMARY VILLAGES for DISCOUNT FOR NEGLECT.

Climate Change Issues (see para 5.1 – 5.5)

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

Yes
all major property developers should then improve performance — and should plant sound trees instead of uprooting trees that have taken 100 years to grow.

Sustainable Communities (see para 6.1 – 6.8).

Infrastructure Provision

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- Broadband
- Community Facilities
- Cycle and walking infrastructure
- Education
- Green infrastructure
- Health
- Public Realm
- Rail and Bus infrastructure
- Recreation open space
- Recycling
- Road infrastructure
- Other (please specify)

Green Infrastructure

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

Empty response box for Q11.

Housing Mix (see para 6.9 – 6.10)

Q12 Do you consider that

- a) More housing should be in the form of small dwellings (flats and terraced housing) ~~Yes~~/No
or
- b) More housing should be in the form of 3-4 bedroom family houses. Yes/~~No~~

Gypsies/Travellers and Show People (see para 6.11 – 6.15)Gypsies and Travellers

Q13 In making appropriate provision for gypsies and travellers, do you agree or disagree with the following options (please mark your choice):

(~~Agree~~/Disagree) Option A – New sites should be spread across the District.

(Agree/~~Disagree~~) Option B – New sites should be located in or close to the towns and primary Villages. — NEXT TO POLICE STATION.

(Agree/Disagree) Option C – Expanding the existing sites

Q14 Do you agree or disagree with the following options.

(Agree/~~Disagree~~) Option A – Sites should be sought that accommodate between eight and twelve pitches.

(~~Agree~~/Disagree) Option B – Individual pitches should be encouraged to allow flexibility and choice for gypsies and travellers distributed across the District.

(~~Agree~~/Disagree) Option C – A combination of A and B; one site or between eight and twelve pitches plus individual pitches.

Travelling Showpeople

Q15 The indications are that only limited provision is required within Selby District for travelling showpeople. If provision is required, should an area of search be:

(Agree/~~Disagree~~) Option A – In or close to the towns of Selby Tadcaster or Sherburn in Elmet?

(~~Agree~~/Disagree) Option B – In close proximity to the strategic road network (such as M62, A1, and A64)?

Please add any further comments you may have about the Core Strategy including the evidence contained in the Background Papers, which are also available on the Councils' website: (please add extra sheets)

AND NORTH YORKS CC.
If SDC do not improve basic facilities,
such as FOOTWAYS, KERBING / STREET LIGHTING,
BUS STANDS, BUS STOPS, ROAD CALMING, & GRASS
CUTTING & LITTER PICKING where needed.
ie for all who pay COUNCIL TAX —
they are not doing their job of
providing VALUE FOR COUNCIL TAX PAID.

Notification

Please tick the boxes below if you would like to be informed when

- The Core Strategy has been submitted to the Secretary of State for independent examination?
- The recommendations have been published of any person appointed to carry out an independent examination of the Core Strategy?
- The Core Strategy has been adopted?

Signed _____

Dated

18TH Dec 2008

If you have any questions or need some further information please contact the Local Development Framework Team on 01757 292063 or by email to: ldf@selby.gov.uk

Please return this form to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB

No later than 17.00hrs (5pm) on Thursday 18 December 2008.



**Selby District Core Strategy
Questionnaire and Comments Form
for Consultation on Further Options
November 2008**



Office use
Ackd
ID No 154

Introduction

The Core Strategy document 'Consultation on Further Options' is available at www.selby.gov.uk, from 'Access Selby' and contact centres in Sherburn and Tadcaster, and all libraries in the District. The document is split into chapters on-line, and the questions below are accompanied by a note of the paragraphs that relate to each subject, for ease of completion. Should you wish to be sent a hard copy of the consultation document please contact the LDF Team, using the details on the last page.

The Council is particularly looking for comments on the following questions. You are welcome to add further comments relevant to the Core Strategy Further Options.

How to make comments:

- Please complete the form in dark ink (add extra sheets if you wish) and send to the address on the last page; or
- Fill in online at www.selby.gov.uk - follow the link from the Council's "In Focus" on the front page of the website.
- **Please submit your comments by 5pm on Thursday 18 December 2008.**
- Please provide your contact details below. *We do not accept anonymous comments.*

a) Personal details		a) Agent details if you are using one	
Name	B L WALES	Name	
Organisation		Organisation	
Address	OLD TRAMWAY Fm HAGG BUSH WAVE BURN SELBY	Address	
Postcode	YO8 3LE	Postcode	
Tel	[REDACTED]	Tel	
Fax	u u	Fax	
Email	[REDACTED]	Email	

Housing

Scale and Distribution of New Housing (see para 3.1 – 3.31)

Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

YES

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1? **Yes**/~~No~~

b) In particular, should there be more or less housing in Tadcaster? **More**/~~Less~~

Takes pressure off the remaining part of the district whilst allowing residents easy commuting to Leeds / York.

c) In particular, should there be more or less housing in Sherburn in Elmet? **More**/~~Less~~

Same as above.

Please explain why in each case.

Strategic Housing Sites at Selby (see para 3.32- 3.41)

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1= highest, 6 = lowest)

- (1) Site A – Cross Hills Lane
- (4) Site B – West of Wistow Road
- (3) Site C – Bondgate/Monk Lane
- (2) Site D – Olympia Mills
- (6) Site E – Baffam Lane
- (5) Site F – Foxhill Lane/Brackenhill Lane

Any other comments?

In placing E and F in 5th and 6th position, the retention of the countryside gap helps Brayton to retain its identity

Managing Housing Supply (see para 3.42 – 3.45)

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

YES

Affordable Housing (see para 3.46 – 3.59)

Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why

YES

Q6 In order to help meet the need for affordable housing, do you agree with the use of commuted sums for housing schemes below the proposed thresholds? If not please explain why

NO

To expect all development schemes however small to contribute financially towards affordable housing will I feel stigmatise self build and individual housing developments

Economy

Strategic Employment Sites (see para 4.3 – 4.12)

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?

Site G - Olympia Park (land adjoining Selby Bypass)

Site H – Burn Airfield

Have you any other suggestions?

The inclusion of Site G together with existing employment sites within the bypass line, together with employment sites in the southern part of the district around M62 corridor/ Egghorough may prove adequate in servicing employment needs without the inclusion of Site H Burn Airfield which should remain as a leisure site and Burn should not be held to ransom by Yorkshire Forward attempting to rid itself of a site bought in haste with public money.

Employment Land (see para 4.13)

Q8 Please tell us whether you agree or disagree with the following statements:

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward.' (~~Agree/Disagree~~)
- B - 'Existing employment premises should be protected from redevelopment where there is evidence of market need.' (~~Agree/Disagree~~)
- C - 'For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations.' (~~Agree/Disagree~~)
- D - 'New housing development should be balanced with an appropriate level of new business development.' (~~Agree/Disagree~~)

Any other comments?

Climate Change Issues (see para 5.1 – 5.5)

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

YES (on the basis that all renewables are not economically viable. A higher figure would alter development)

Sustainable Communities (see para 6.1 – 6.8)

Infrastructure Provision

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- Broadband
- Community Facilities
- Cycle and walking infrastructure
- Education
- Green infrastructure
- Health
- Public Realm
- Rail and Bus infrastructure
- Recreation open space
- Recycling
- Road infrastructure
- Other (please specify)

Green Infrastructure

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

NO

Housing Mix (see para 6.9 – 6.10)

Q12 Do you consider that

- a) More housing should be in the form of small dwellings (flats and terraced housing) ~~Yes~~/No
or
b) More housing should be in the form of 3-4 bedroom family houses Yes/~~No~~

Gypsies/Travellers and Show People (see para 6.11 – 6.15)Gypsies and Travellers

Q13 In making appropriate provision for gypsies and travellers, do you agree or disagree with the following options (please mark your choice):

(~~Agree~~/~~Disagree~~) Option A – New sites should be spread across the District.

(~~Agree~~/~~Disagree~~) Option B – New sites should be located in or close to the towns and primary Villages.

(~~Agree~~/~~Disagree~~) Option C – Expanding the existing sites

Q14 Do you agree or disagree with the following options:

(~~Agree~~/~~Disagree~~) Option A – Sites should be sought that accommodate between eight and twelve pitches.

(~~Agree~~/~~Disagree~~) Option B – Individual pitches should be encouraged to allow flexibility and choice for gypsies and travellers distributed across the District.

(~~Agree~~/~~Disagree~~) Option C – A combination of A and B; one site of between eight and twelve pitches plus individual pitches.

Travelling Showpeople

Q15 The indications are that only limited provision is required within Selby District for travelling showpeople. If provision is required, should an area of search be:

(~~Agree~~/~~Disagree~~) Option A – In or close to the towns of Selby, Tadcaster or Sherburn in Elmet?

(~~Agree~~/~~Disagree~~) Option B – In close proximity to the strategic road network (such as M62, A1, and A64)?

Please add any further comments you may have about the Core Strategy including the evidence contained in the Background Papers, which are also available on the Councils' website: (please add extra sheets)

Notification

Please tick the boxes below if you would like to be informed when

- The Core Strategy has been submitted to the Secretary of State for independent examination?
- The recommendations have been published of any person appointed to carry out an independent examination of the Core Strategy?
- The Core Strategy has been adopted?

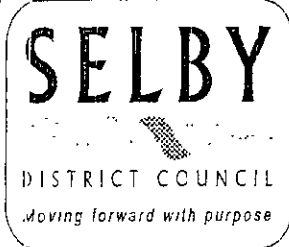
Signed _____

Dated

16/12/08

If you have any questions or need some further information please contact the Local Development Framework Team on 01757 292063 or by email to ldf@selby.gov.uk.

Please return this form to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB
No later than 17.00hrs (5pm) on Thursday 18 December 2008.



Selby District Core Strategy Questionnaire and Comments Form for Consultation on Further Options November 2008



Office use
Ackd
D.No
18 DEC 2008

Introduction
The Core Strategy document 'Consultation on Further Options' is available at www.selby.gov.uk, from 'Access Selby' and contact centres in Sherburn and Tadcaster, and all libraries in the District. The document is split into chapters on-line, and the questions below are accompanied by a note of the paragraphs that relate to each subject, for ease of completion. Should you wish to be sent a hard copy of the consultation document please contact the LDF Team, using the details on the last page.
The Council is particularly looking for comments on the following questions. You are welcome to add further comments relevant to the Core Strategy Further Options.

- How to make comments:**
- Please complete the form in dark ink (add extra sheets if you wish) and send to the address on the last page; or
 - Fill in online at www.selby.gov.uk - follow the link from the Council's "In Focus" on the front page of the website.
 - **Please submit your comments by 5pm on Thursday 18 December 2008.**
 - Please provide your contact details below. *We do not accept anonymous comments.*

a) Personal details		a) Agent details if you are using one	
Name	L O'DOWD	Name	
Organisation		Organisation	
Address	69 HEMPBRIDGE ROAD SELBY NORTH YORKSHIRE	Address	
Postcode	YO8 4XX	Postcode	
Tel	[REDACTED]	Tel	
Fax		Fax	
Email		Email	

Housing
Scale and Distribution of New Housing (see para 3.1 – 3.31)
Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

(PLEASE SEE BACK PAGE ONLY THANK YOU)

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1? **Yes/No**

b) In particular, should there be more or less housing in Tadcaster? **More/Less**

c) In particular, should there be more or less housing in Sherburn in Elmet? **More/Less**

Please explain why in each case.

Strategic Housing Sites at Selby (see para 3.32- 3.41)

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1= highest, 6 = lowest)

- () Site A – Cross Hills Lane
- () Site B – West of Wistow Road
- () Site C – Bondgate/Monk Lane
- () Site D – Olympia Mills
- () Site E – Baffam Lane
- () Site F – Foxhill Lane/Brackenhill Lane

Any other comments?

Managing Housing Supply (see para 3.42 – 3.45)

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

Affordable Housing (see para 3.46 – 3.59)

Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why.

Q6 In order to help meet the need for affordable housing, do you agree with the use of commuted sums for housing schemes below the proposed thresholds? If not please explain why

Economy

Strategic Employment Sites (see para 4.3 – 4.12)

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?

Site G - Olympia Park (land adjoining Selby Bypass)

Site H – Burn Airfield

Have you any other suggestions?

Employment Land (see para 4.13)

Q8 Please tell us whether you agree or disagree with the following statements:

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward.' (**Agree/Disagree**)
- B - 'Existing employment premises should be protected from redevelopment where there is evidence of market need.' (**Agree/Disagree**)
- C - 'For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations.' (**Agree/Disagree**)
- D - 'New housing development should be balanced with an appropriate level of new business development.' (**Agree/Disagree**)

Any other comments?

Climate Change Issues (see para 5.1 – 5.5)

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

Sustainable Communities (see para 6.1 – 6.8)

Infrastructure Provision

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- Broadband
- Community Facilities
- Cycle and walking infrastructure
- Education
- Green infrastructure
- Health
- Public Realm
- Rail and Bus infrastructure
- Recreation open space
- Recycling
- Road infrastructure
- Other (please specify)

Green Infrastructure

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

Housing Mix (see para 6.9 – 6.10)

Q12 Do you consider that

- a) More housing should be in the form of small dwellings (flats and terraced housing) **Yes/No**
or
- b) More housing should be in the form of 3-4 bedroom family houses **Yes/No**

Gypsies/Travellers and Show People (see para 6.11 – 6.15)

Gypsies and Travellers

Q13 In making appropriate provision for gypsies and travellers, do you agree or disagree with the following options (please mark your choice):

(**Agree/Disagree**) Option A – New sites should be spread across the District.

(**Agree/Disagree**) Option B – New sites should be located in or close to the towns and primary Villages.

(**Agree/Disagree**) Option C – Expanding the existing sites

Q14 Do you agree or disagree with the following options:

(**Agree/Disagree**) Option A – Sites should be sought that accommodate between eight and twelve pitches.

(**Agree/Disagree**) Option B – Individual pitches should be encouraged to allow flexibility and choice for gypsies and travellers distributed across the District.

(**Agree/Disagree**) Option C – A combination of A and B; one site of between eight and twelve pitches plus individual pitches.

Travelling Showpeople

Q15 The indications are that only limited provision is required within Selby District for travelling showpeople. If provision is required, should an area of search be:

(**Agree/Disagree**) Option A – In or close to the towns of Selby, Tadcaster or Sherburn in Elmet?

(**Agree/Disagree**) Option B – In close proximity to the strategic road network (such as M62, A1, and A64)?

Please add any further comments you may have about the Core Strategy including the evidence contained in the Background Papers, which are also available on the Councils' website: (please add extra sheets)

I WOULD LIKE TO SAY THAT SELBY IS UNUSUAL IN ITS INTIMATE, ACCESSIBLE VARIETY OF TOWN + COUNTRY EXPERIENCES WITH THE WATERWAYS AND GREEN FARM LAND ALL WITHIN 1 MILE WALKING DISTANCE WHICH I'M SURE IS VERY MUCH THE CORE OF MOVING TO LIVE HERE. I'VE SPOKEN TO YOUNG FAMILIES, ELDERLY RETIRED AND HARD WORKING INDIVIDUALS WHO ALL APPRECIATE THIS QUALITY OF SELBY. PLEASE SAVE OUR GREEN SURROUNDS AND CORRIDORS FOR PERSONS, WILDLIFE AND FLOOD SAFETY VALUES AND FOCUS BUILDING + REGENERATION SCHEMES ON BROWN FIELD + DERELICT SITES. NEWSPAPER ARTICLES HAVE FEARED BUILDING CLOSE TO THE RIVER BUT PRACTICAL ARCHITECTS WOULD DESIGN RAISED LIVING PERHAPS WITH CAR PARKING BETWEEN THE SUPPORTS OFFERING TIDAL STREAM VIEWS AND EASY ACCESS TO THE SHOPS. IN THE PRESENT CLIMATE. OTHER HOUSING STOCK COULD BE ACQUIRED FROM THE INCREASING NUMBER OF REPOSSESSIONS EMERGING, SOLVING TWO PROBLEMS AT ONE. I DID SEND IN A DESIGN FOR A COMBINED AMPHITHEATRE/SKATE BOARD PARK AND SWAN LOUNGE FOR THE CENTRAL PARK THAT COULD EASILY BE HOSED DOWN AFTER FLOODING + PROVIDE A CELEBRATORY HEART TO THE TOWN

Notification

Please tick the boxes below if you would like to be informed when

- The Core Strategy has been submitted to the Secretary of State for independent examination?
- The recommendations have been published of any person appointed to carry out an independent examination of the Core Strategy?
- The Core Strategy has been adopted?

Signed _____

Dated 18-12-2008

If you have any questions or need some further information please contact the Local Development Framework Team on 01757 292063 or by email to ldf@selby.gov.uk

Please return this form to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB

No later than 17.00hrs (5pm) on Thursday 18 December 2008.

SINCE THEN SKATEBOARDING OPTIONS HAVE EMERGED AT ABBEY LEASURE AND AN 'AMPHITHEATRE' NEAR THE A19 SWING BRIDGE — SUGGESTING THAT THE HEART IS SHIFTING TO WATERWAYS DEVELOPMENTS FOR SELBY'S FUTURE — ^{EMPHASISING} "BEING 'GREEN'!"



**Selby District Core Strategy
Questionnaire and Comments Form
for Consultation on Further Options
November 2008**

156

CUSTOMER SERVICE
18

LOCAL DEVELOPMENT FRAMEWORK

Office use
Ackd 18/11/08
ID No

Introduction

The Core Strategy document 'Consultation on Further Options' is available at www.selby.gov.uk, from 'Access Selby' and contact centres in Sherburn and Tadcaster, and all libraries in the District. The document is split into chapters on-line, and the questions below are accompanied by a note of the paragraphs that relate to each subject, for ease of completion. Should you wish to be sent a hard copy of the consultation document please contact the LDF Team, using the details on the last page.

The Council is particularly looking for comments on the following questions. You are welcome to add further comments relevant to the Core Strategy Further Options.

How to make comments:

- Please complete the form in dark ink (add extra sheets if you wish) and send to the address on the last page; or
- Fill in online at www.selby.gov.uk - follow the link from the Council's "In Focus" on the front page of the website.
- **Please submit your comments by 5pm on Thursday 18 December 2008.**
- Please provide your contact details below. *We do not accept anonymous comments.*

a) Personal details		a) Agent details if you are using one	
Name	MISS F MCGUIRE	Name	
Organisation		Organisation	
Address	MILLEN LODGE 47 WISTOW ROAD SELBY	Address	
Postcode	YO8 3LY	Postcode	
Tel	[REDACTED]	Tel	
Fax		Fax	
Email		Email	

Housing

Scale and Distribution of New Housing (see para 3.1 – 3.31)

Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1? **Yes/No**

b) In particular, should there be more or less housing in Tadcaster? **More/Less** *More*

c) In particular, should there be more or less housing in Sherburn in Elmet? **More/Less**

Please explain why in each case.

Better links to motorways - M1 A64 A1

Strategic Housing Sites at Selby (see para 3.32- 3.41)

Q3 Please tell us whether you ~~agree~~ disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1= highest, 6 = lowest)

(3) Site A – Cross Hills Lane

(1) Site B – West of Wistow Road

(2) Site C – Bondgate/Monk Lane

(5) Site D – Olympia Mills

(4) Site E – Baffam Lane

(6) Site F – Foxhill Lane/Brackenhill Lane

** I strongly disagree that these sites should be built upon.*

Any other comments?

lower preference areas eg foxhill & Olympia mills sites are nearest to the best road links eg the bypass and thus would not cause congestion problems in the Selby town area.

Managing Housing Supply (see para 3.42 – 3.45)

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

Affordable Housing (see para 3.46 – 3.59)

Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why.

The thresholds should suit the areas they are attached to; similar housing to reflect existing housing. They should not be mixed eg 'affordable' next to 'executive' housing

Q6 In order to help meet the need for affordable housing, do you agree with the use of commuted sums for housing schemes below the proposed thresholds? If not please explain why

Ok As long as not placed next to 'executive' housing people have worked hard to buy higher priced properties and any nearby 'affordable' housing will affect the areas status and be reflected in lowered house prices.

Economy**Strategic Employment Sites (see para 4.3 – 4.12)**

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?

Site G - Olympia Park (land adjoining Selby Bypass)

Site H - Burn Airfield

Have you any other suggestions?

Sherburn / Church Fenton / Barlow Airfields

Employment Land (see para 4.13)

Q8 Please tell us whether you agree or disagree with the following statements:

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward.' (**Agree/Disagree**)
- B - 'Existing employment premises should be protected from redevelopment where there is evidence of market need.' (**Agree/Disagree**)
- C - 'For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations.' (**Agree/Disagree**)
- D - 'New housing development should be balanced with an appropriate level of new business development.' (**Agree/Disagree**)

Any other comments?

Climate Change Issues (see para 5.1 – 5.5)

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

Sustainable Communities (see para 6.1 – 6.8)*Infrastructure Provision*

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- Broadband
- Community Facilities
- Cycle and walking infrastructure
- Education
- Green infrastructure
- Health
- Public Realm
- Rail and Bus infrastructure
- Recreation open space
- Recycling
- Road infrastructure
- Other (please specify)

Green Infrastructure

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

Housing Mix (see para 6.9 – 6.10)**Q12** Do you consider that

- a) More housing should be in the form of small dwellings (flats and terraced housing) ~~Yes/No~~
or
b) More housing should be in the form of 3-4 bedroom family houses ~~Yes/No~~

Gypsies/Travellers and Show People (see para 6.11 – 6.15)Gypsies and Travellers**Q13** In making appropriate provision for gypsies and travellers, do you agree or disagree with the following options (please mark your choice):~~(Agree/Disagree)~~ Option A – New sites should be spread across the District.~~(Agree/Disagree)~~ Option B – New sites should be located in or close to the towns and primary Villages.~~(Agree/Disagree)~~ Option C – Expanding the existing sites**Q14** Do you agree or disagree with the following options:~~(Agree/Disagree)~~ Option A – Sites should be sought that accommodate between eight and twelve pitches.~~(Agree/Disagree)~~ Option B – Individual pitches should be encouraged to allow flexibility and choice for gypsies and travellers distributed across the District.~~(Agree/Disagree)~~ Option C – A combination of A and B; one site of between eight and twelve pitches plus individual pitches.Travelling Showpeople**Q15** The indications are that only limited provision is required within Selby District for travelling showpeople. If provision is required, should an area of search be:~~(Agree/Disagree)~~ Option A – In or close to the towns of Selby, Tadcaster or Sherburn in Elmet?~~(Agree/Disagree)~~ Option B – In close proximity to the strategic road network (such as M62, A1, and A64)?

Please add any further comments you may have about the Core Strategy including the evidence contained in the Background Papers, which are also available on the Councils' website: (please add extra sheets)

(Q3) OPTIONS B & C : these sites both feed traffic onto Flaxley Road, Millgate and Scott Road. These roads are already congested at any time of the day and would not be able to cope with extra traffic. Remember the problems encountered not so long ago when Dam Bridge was being repaired!

Also site C was changed in status when Kirby Avenue was built. Upon which it was said that this site would remain untouched?

The environmental factors should also be considered; These areas are used by walkers & horse riders too.

Notification

Please tick the boxes below if you would like to be informed when

- The Core Strategy has been submitted to the Secretary of State for independent examination?
- The recommendations have been published of any person appointed to carry out an independent examination of the Core Strategy?
- The Core Strategy has been adopted?

Signed _____

Dated 17/11/08

If you have any questions or need some further information please contact the Local Development Framework Team on 01757 292063 or by email to ldf@selby.gov.uk.

Please return this form to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB
No later than 17.00hrs (5pm) on Thursday 18 December 2008.

SELBY

DISTRICT COUNCIL

Moving forward with purpose

Selby District Core Strategy Questionnaire and Comments Form for Consultation on Further Options November 2008

LDF LOCAL DEVELOPMENT FRAMEWORK

Office use

Ackd

ID No 157

18 DEC 2008

Introduction

The Core Strategy document 'Consultation on Further Options' is available at www.selby.gov.uk, from 'Access Selby' and contact centres in Sherburn and Tadcaster, and all libraries in the District. The document is split into chapters on-line, and the questions below are accompanied by a note of the paragraphs that relate to each subject, for ease of completion. Should you wish to be sent a hard copy of the consultation document please contact the LDF Team, using the details on the last page.

The Council is particularly looking for comments on the following questions. You are welcome to add further comments relevant to the Core Strategy Further Options.

How to make comments:

- Please complete the form in dark ink (add extra sheets if you wish) and send to the address on the last page; or
- Fill in online at www.selby.gov.uk - follow the link from the Council's "In Focus" on the front page of the website.
- Please submit your comments by 5pm on Thursday 18 December 2008.
- Please provide your contact details below. *We do not accept anonymous comments.*

a) Personal details		a) Agent details if you are using one	
Name	RR FORRESTOR	Name	
Organisation		Organisation	
Address	Fardin House Main Street Hemingbrough Selby W Yorks #	Address	
Postcode	YO8 6QU	Postcode	
Tel	[REDACTED]	Tel	
Fax	[REDACTED]	Fax	
Email	[REDACTED]	Email	

Housing

Scale and Distribution of New Housing (see para 3.1 – 3.31)

Q1 Do you agree with the Council's criteria for defining Primary Villages and, if so, do you agree with those 20 villages selected? If not please explain why.

Agree in principle to criteria.
Object to Cliffe and Hemingbrough being classed as Secondary - they have reasonable services and public transport.
Object to no development at all in Secondary Villages

Q2 Bearing in mind the commentary on the role of the various settlements and the overriding objective of concentrating growth in Selby

a) Do you agree with the overall distribution of housing as indicated in the proposed distribution Table 1? **Yes/No**

Object to No development in Secondary Villages
too much dev in Selby - not enough choice

b) In particular, should there be more or less housing in Tadcaster? **More/Less**

Tadcaster is a market town which serves surrounding rural (Green Belt) area. Should have more housing similar to J. in Elmet.

c) In particular, should there be more or less housing in Sherburn in Elmet? **More/Less**

Sherburn (and Tadcaster) should have more housing. More attractive places to live than Selby and not in flood plain.

Please explain why in each case.

Strategic Housing Sites at Selby (see para 3.32- 3.41)

Q3 Please tell us whether you agree or disagree with the following options for strategic housing development on the edge of Selby (please number in preference order 1= highest, 6 = lowest)

- (1) Site A - Cross Hills Lane
- (2) Site B - West of Wistow Road
- (4) Site C - Bondgate/Monk Lane
- (5) Site D - Olympia Mills
- (6) Site E - Baffam Lane
- (3) Site F - Foxhill Lane/Brackenhill Lane

Any other comments?

Managing Housing Supply (see para 3.42 - 3.45)

Q4 Do you agree that market housing should only be allowed in the Principal Town (Selby); Local Service Centres (Sherburn in Elmet and Tadcaster) and the 20 Primary Villages? If not please explain why

No
Some market housing should be permitted in Secondary Villages for choice. It is discrimination to only allow people that are eligible for affordable housing to live in secondary villages. It is social exclusion contrary to P.P.S.S.

Affordable Housing (see para 3.46 – 3.59)

Q5 Do you agree with the different thresholds proposed for affordable housing? If not please explain why.

No. don't agree. A 60/40 split too excessive should be 80/20 or less. Object to development in Selby being excluded from the contribution to affordable housing. ~~threshold in Selby~~ should be lower - ~~not sustainable~~ location.

Q6 In order to help meet the need for affordable housing, do you agree with the use of commuted sums for housing schemes below the proposed thresholds? If not please explain why

No do not agree to commuted sums. No guarantee of where/when money would be spent. Worry that a single house outside Selby will contribute to 9 dwellings in Selby doesn't.

Economy

Strategic Employment Sites (see para 4.3 – 4.12)

Q7 If a strategic employment site is provided which of the following do you consider is the most appropriate location?

Site G - Olympia Park (land adjoining Selby Bypass) Site H - Burn Airfield

Have you any other suggestions?

Yes - close to highway junctions of Eggborough / M62 and at power stations.

Employment Land (see para 4.13)

Q8 Please tell us whether you agree or disagree with the following statements:

- A - Land allocated for employment purposes but which is undeveloped should be considered for mixed use or possibly other uses if there is no realistic prospect of employment development coming forward.' (~~Agree/Disagree~~)
- B - 'Existing employment premises should be protected from redevelopment where there is evidence of market need.' (~~Agree/Disagree~~)
- C - 'For new business development the focus should be on securing small/medium sized business space and general industrial premises in suitable locations.' (~~Agree/Disagree~~)
- D - 'New housing development should be balanced with an appropriate level of new business development.' (~~Agree/Disagree~~)

Any other comments?
 → Both need and evidence need to be carefully monitored.
 D - needs care otherwise a drop in demand for industrial land could inhibit release of housing land

Climate Change Issues (see para 5.1 – 5.5)

Q9 Do you agree that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewable or low carbon supplies? If not, should the percentage be higher or lower?

Only agree if it is undertaken without individual houses having solar panels (windtubs) - local energy percentage should be higher or not at all.

Sustainable Communities (see para 6.1 – 6.8)

Infrastructure Provision

Q10 The Government is introducing a Community Infrastructure Levy on new development. Please indicate your priorities for using the funding received from the Levy. Please tick those that you consider to be important.

- Broadband
- Community Facilities
- Cycle and walking infrastructure
- Education
- Green infrastructure
- Health
- Public Realm
- Rail and Bus infrastructure
- Recreation open space
- Recycling
- Road infrastructure
- Other (please specify)

Green Infrastructure

Q11 Do you have any views on opportunities to enhance or create Green Infrastructure?

No strong views
Specific schemes should be identified to direct contributions towards

Housing Mix (see para 6.9 – 6.10)

Q12 Do you consider that

- a) More housing should be in the form of small dwellings (flats and terraced housing) ~~Yes/No~~
or
- b) More housing should be in the form of 3-4 bedroom family houses ~~Yes/No~~

Gypsies/Travellers and Show People (see para 6.11 – 6.15)

Gypsies and Travellers

Q13 In making appropriate provision for gypsies and travellers, do you agree or disagree with the following options (please mark your choice):

- (~~Agree/Disagree~~) Option A – New sites should be spread across the District.
- (~~Agree/Disagree~~) Option B – New sites should be located in or close to the towns and primary Villages.
- (~~Agree/Disagree~~) Option C – Expanding the existing sites

Q14 Do you agree or disagree with the following options:

- (~~Agree/Disagree~~) Option A – Sites should be sought that accommodate between eight and twelve pitches.
- (~~Agree/Disagree~~) Option B – Individual pitches should be encouraged to allow flexibility and choice for gypsies and travellers distributed across the District.
- (~~Agree/Disagree~~) Option C – A combination of A and B; one site of between eight and twelve pitches plus individual pitches.

Travelling Showpeople

Q15 The indications are that only limited provision is required within Selby District for travelling showpeople. If provision is required, should an area of search be:

- (~~Agree/Disagree~~) Option A – In or close to the towns of Selby, Tadcaster or Sherburn in Elmet?
- (~~Agree/Disagree~~) Option B – In close proximity to the strategic road network (such as M62, A1, and A64)?

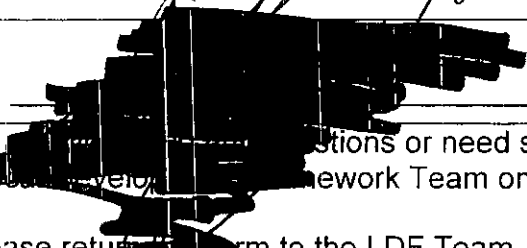
Please add any further comments you may have about the Core Strategy including the evidence contained in the Background Papers, which are also available on the Councils' website: (please add extra sheets)

Notification

Please tick the boxes below if you would like to be informed when

- The Core Strategy has been submitted to the Secretary of State for independent examination?
- The recommendations have been published of any person appointed to carry out an independent examination of the Core Strategy?
- The Core Strategy has been adopted?

Signed



Dated

18 Dec 2008

For any questions or need some further information please contact the Local Development Framework Team on 01757 292063 or by email to ldf@selby.gov.uk.

Please return this form to the LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB
No later than 17.00hrs (5pm) on Thursday 18 December 2008.

The need for responsible and directed growth in the villages.

There is inadequate recognition by the core strategy document of the washover from the Golden Triangle and the necessity of higher value market houses to satisfy the unmet demand and increase the number of entrepreneurs/senior and middle managers into the northern area of the villages. There has to be a balanced growth in middle and lower value houses for upper middle class villages without community facilities simply stagnate and this cannot be a responsible policy. Contrast the vibrancy and community cohesion between Bilbrough and Colton.

So what sort of growth? Prospectively in say Appleton Roebuck sized villages at the rate of 0.33% year on year on bedrooms built, and at the rate of 1% in the smaller villages. To provide housing for the elderly I propose additional housing numbers for bungalows with up to 3 bedrooms on the ground floor and with an S106 condition that they must forever stay with such ground floor bedrooms and ground floor living rooms.

The character of villages is pastoral, space around buildings, there must be an end to high town style densities in the village areas.

The proposal for unlimited affordable houses in the smaller unserved villages does not make too much sense, but could make sense if there was appropriate bus services to service centres.

The population is aging, but there has been little or no growth in ground floor only construction (bungalows). The current survey of unmet demand will probably not throw up the demand as the style of questions do not provide such an appraisal. So what is the unmet demand for aged persons housing beyond that of social aged persons housing?

It is not acceptable to have little or no growth in the unserved villages because it leads to stagnation, to an aging population and house prices that will only escalate and prohibit young families and flowing from this the acceleration to even greater decline in social cohesion brought by young families, especially into the infant/primary schools. When my son was at school in Appleton Roebuck in the seventies there was a school role of 130, Bolton Percy school was flourishing, now the school is down to 90 and diminishing and Bolton Percy school has closed. The numbers are staying high because of the reputation of the school and attracting children from beyond the schools historic catchment area. But is this not the case at Tadcaster Grammar School as well? Youngsters need other youngsters to play with. The youngsters in Colton village all go to private schools. And rarely have the opportunity to mix, this is bad for social cohesion.

The age when people get married and have children is increasing, young people going to HE and FE leave the villages and Tadcaster and in the main do not return, primarily because if they do then they have to live with their parents because of house prices. In the main those young people who remain in the town and the villages have generally not been to FE or FE. The town and the villages are loosing the input that FE and HE can bring.

Clustering and better focused public transport to community activities is a solution, Copmanthorpe and Tadcaster have good young peoples activities with scouts, guides, brownies, youth clubs, so on the nights when these activities are available then have focused affordable public transport.

Those villages with village halls have good social cohesion, those without do not. People will congregate given reasons, but they tend to want to congregate locally. Village tribalism is evident and needs to be broken down. Sharing with obvious joint ownership and commitment is achievable. There is a strong case for most villages to have good village halls, the SDC have studied the Dutch model, why not bring over to the District.

Brian Percival

7 December 2008

Springfield House
Cotton Lane End
Colton
Tadcaster
LS24 8EJ.

rec 8/1/09
ACK 22/1/09

CS/CFO/159

terry heselton

From: John Mackman [johnmackman@googlemail.com]
Sent: 12 January 2009 21:56
To: terry heselton
Subject: Fwd: Selby Core Strategy Development Plan
Attachments: MDSmith_CSDP_Response.pdf

Hello Terry
 Just seen this on my e-mail
 Have you also recvd this correspondence ?
 Would you like to suggest a suitable reply
 John M

----- Forwarded message -----

From: Martin D Smith <mdsmith.1957@tiscali.co.uk>
Date: Thu, Jan 8, 2009 at 11:43 AM
Subject: Selby Core Strategy Development Plan
To: jmackman@selby.gov.uk
Cc: John Grogan <GroganJ@parliament.uk>

To Members of the Planning Committee and Selby North Councillors

Dear Councillors,

Response to the Core Strategy Development Plan

It is disappointing that public consultation on proposals included in the Selby Core Strategy Development Plan was so poorly publicised: my attention, for example, was only drawn by the local neighbourhood watch committee. It is also disappointing, though perhaps predictable, that just three weeks were set aside for consultation on plans of some considerable importance.

Of direct concern to me is the listing of land adjacent to Bondgate and Monk Lane as a potential site for the construction of 1000+ houses. This raises the usual issues relating to traffic and urban sprawl impacts, but these are likely to be common to many potential development sites and objections on this basis inevitably risk a charge of 'nimbyism'. In this particular case, however, there are specific grounds for concern over flood risk (the site is on undeveloped land designated high-risk Flood Zone 3a) both in the immediate vicinity and in terms of potential knock-on impacts. There are, of course, flood concerns with several of the potential development locations. However, it is the Bondgate/Monk Lane location with which I am intimately familiar.

I am not qualified to comment on estimates of future housing requirements in Selby district, though I would note that any such calculation is based on a number of a priori assumptions of long-term social, demographic and economic trends which may or may not be justified. I do, however, strongly support arguments for centring any development in the town of Selby rather than furthering the

13/01/2009

environmentally unsustainable growth of dormitory villages.

I do not wish to entangle myself in the dog-eat-doggery business of listing sites in order of preference, as requested in the consultation questionnaire. Instead I am submitting a detailed response in the attached PDF document. I hope will take the time to read my paper which is in three sections: the first two deal with the current state of climate science and the economics of climate change; the third section relates these issues to planning for increasing flood risk, with specific reference to the site in question.

I hope you will bear the arguments I have raised in mind.

Yours faithfully,

Martin Smith

31, Bondgate
Selby
YO8 3LX

Climate Change, Flood Risk and Future Development in Selby

A response to the Core Strategy Development Plan

Martin D. Smith *

Published 8 Jan 2009

Abstract

In recent years the UK has been battered by a succession of major flooding events, at huge cost. Science suggests that floods will become more frequent and severe during the coming decades, as the effects of global climate change are felt. Whether floods become more damaging or not will be determined by the extent of regional climatic change, the scale of investment in adaptation, and by local planning decisions. In particular, increasing urbanisation of the floodplain is likely to significantly increase the risks to life, limb and property. I argue that planning decisions must take into account increasing flood risk and the potential costs to future generations of inappropriate development.

Keywords: flood risk, climate change, Selby development

1. The State Of Climate Science

Until quite recently most politicians, perhaps reflecting a wider public apathy, seem to have regarded climate change as a somewhat peripheral issue. Concerns over the environment and humankind's impact on it were generally deemed subservient to those policy matters which have traditionally dominated the political dialectic – economics, crime, social policy, national security and so forth. Undoubtedly, public acceptance of the importance of tackling climate change was not helped by a persistent and concerted campaign of disinformation by sceptics who sowed seeds of doubt in the public – and political – psyche¹. Just five years ago, Sir David King (2004) raised a few quizzical eyebrows when he described global climate change as “the most severe problem that we are facing today – more serious even than the threat of terrorism”. His detractors (most of them, it should be said, from outside the scientific community) cautioned that the govern-

*Address for correspondence: 31 Bondgate, Selby, North Yorkshire, YO8 3LX.

Phone: 01757 290344. Mobile: 07870 440779. Email: mdsmith.1957@tiscali.co.uk

¹ Sceptics claimed variously that: global warming is not happening; the world is warming but it's a natural phenomenon; even if the world is warming and human activity is the cause, the economic costs of reversing the trend are too high, etc. The more vociferous of these scientific contrarians are linked to free-market think tanks largely funded by US-based fossil fuel industries. Their tactics have closely paralleled the criminally disreputable manoeuvres of the tobacco industry throughout the 1950s, '60s and '70s in its campaign to undermine the science linking smoking to serious disease. Despite repeated claims to the contrary, most of science (what the philosopher of science Thomas Kuhn termed 'normal science') is a process of consensus building. In this case an overwhelming consensus has been reached amongst climate scientists, that man-made global warming is a fact.

159

ment's then chief scientific advisor had gone beyond what could be sustained by the data.

1.1 The Stern Review

It was not until two years later that Sir Nicholas, now Lord, Stern (2006) brought climate change into the mainstream of British political debate. Stern was not a climate scientist but a distinguished economist, the head of the Government Economic Service and a former chief economist at the World Bank. His landmark review spelled out the scale and urgency of the problem in language which politicians could understand: climate change is a serious threat; human activities are the cause; an urgent global response is required.

The message of the Stern Review remained upbeat however, for whilst the problem is serious, it argued, it is nonetheless manageable – given the political will and sufficient commitment of resources. King and Stern were agreed: tackling climate change would be expensive but not prohibitively so. Stern famously calculated that the total cost need not exceed 1 percent of global GDP per annum; in contrast, the total economic costs of inaction, he estimated, might reach as much 20 percent of global GDP per annum – *in perpetuity*.

It is clear now that both commentators' qualitative assessments of the overarching political, economic, social, and environmental, importance of climate change were correct. Quantitatively, however, it is becoming increasingly apparent that the Stern Review underestimated the likely scale of climatic change – and the speed at which it would unfold. Lord Stern himself conceded as much earlier last year, commenting that,

Emissions are growing much faster than we'd thought, the absorptive capacity of the planet is less than we'd thought, the risks of greenhouse gases are potentially bigger than more cautious estimates and the speed of climate change seems to be faster.
(*The Guardian* 2008)

Stern had based his report on the most authoritative science then available, the Third Assessment Report (TAR) of the U.N. Intergovernmental Panel on Climate Change (IPCC) published in 2001, with additional input from more recent published research. The IPCC's major assessment reports represent the views of 2,500 leading climate scientists from around the globe and their governments. Their reports are consensual and authoritative but, some critics argue, tend to be overly conservative². Furthermore, because the IPCC bases its reports only on published, peer-reviewed data, it necessarily sacrifices currency for authority. The 2001 TAR – and thus to some extent the 2006 Stern Review – thus represented a summation of the state of scientific knowledge ca. 1999/2000.

1.2 Beyond TAR and Stern

Last year the IPCC (2007) published its Fourth (AR4) Assessment Report which consolidated the conclusions of the TAR. Warming of the climate system is now

² A number of European contributors to the IPCC's 2007 assessment report complained that some of its findings had been watered down to placate representatives of China, Saudi Arabia and a number of other not entirely scientifically disinterested nations.

159

considered to be 'unequivocal', for example. The more recent data available to the AR4 authors suggested that carbon feedback mechanisms are likely to be more important than had previously been thought.³ This observation increases the uncertainties in forecasting future climatic change. Because positive feedbacks seem to predominate in the earth's climate systems, the overall effect of such mechanisms is likely to be to amplify and accelerate the current warming trend and its associated impacts. The AR4 authors therefore raised the upper limit on the potential increase in global temperature and whilst, somewhat controversially, revising *downward* their estimate of the most likely rise in global sea-level, removed any *upper* bound. Of course, the same caveats mentioned previously in relation to the TAR report also apply to the AR4 assessment.

Recent (post-AR4) evidence indicates that climate change is accelerating. At high latitudes temperature is rising faster than computer models have predicted⁴ and ice, both at sea and on land is melting at an alarming and accelerating rate^{5,6}. In 2002 the annual growth rate of the atmospheric concentration of CO₂ rose sharply from an average of around 1.5 parts per million (ppm) per year during the 1980s and 1990s to an average of 2.1 ppm per year. One source of this increase may be the rise in global emissions (driven in part by increased coal burning in China). There are also indications however, that global carbon sinks

³ Feedback is a feature of *non-linear* dynamical systems with multiple variables which interact in complex, unpredictable ways. *Positive* feedbacks act to amplify the effects of dynamical forcing such as the radiative forcing which results from increasing atmospheric CO₂ concentrations; *negative* feedbacks tend to cancel the effects of forcing and pull a system back towards equilibrium. Earth's climate is a function of non-linear interactions involving the atmospheric, oceanic, cryospheric (involving land and sea ice), geological and biological processes in which positive feedback appears to dominate. As a result abrupt transitions from one quasi-stable equilibrium state to another very different state are known to have occurred in the past and may well do so again (Alley *et al.* 2003). Feedback mechanisms are not well-understood, the thresholds or 'tipping points' at which they trigger are a matter of debate, hence the IPCC's reluctance to include them in their predictions. It is likely, however, that the crossing of feedback thresholds is either imminent or already underway in some systems.

⁴ In eastern Siberia air temperatures have risen by as much as 5 degrees in the past decade. The consequent melting of permafrost is thought to be responsible for a reported 200-fold increase in local methane concentrations (Monastersky 2008). Methane is a more potent greenhouse than CO₂; after a decade in which global methane abundance remained stable levels began to increase in early 2007 with a possible northern hemisphere origin (Rigby *et al.* 2008).

⁵ The loss of Arctic sea ice began to accelerate around 2002 consistent with positive feedback models – but many decades ahead of IPCC predictions (Serreze & Stroeve 2008). If the trend continues, the Arctic may be ice free during the boreal summer within a decade.

⁶ Recent observations of the ice sheets of Greenland (Chen *et al.* 2006) and West Antarctica suggest melting has begun to accelerate. Ice sheet melting is a strongly non-linear process which, once underway, can progress rapidly under the influence of multiple positive feedbacks. Such mechanisms seem to be responsible for the observed acceleration in both Greenland and West Antarctica. In Greenland surface meltwater percolates to, and lubricates, the base of the ice sheet (Zwally *et al.* 2002). In contrast, the West Antarctic ice sheet (WAIS) seems to be responding to the recent collapse of several small ice shelves around the Antarctic peninsula 'uncorking' the outflow of glacial ice from the interior (Scambos *et al.* 2004; Elliott 2008). It is cautionary to note in this context that the possibility of ice shelf collapse was suggested 30 years ago by the late British glaciologist John Mercer (1978). Mercer argued that a southward wave of shelf disintegrations and associated glacier accelerations might presage the collapse of the WAIS itself. It has been argued that abrupt non-linear collapse of either Greenland or the WAIS cannot be ruled out, with major consequences for global sea-level rise (Hansen 2007; Hansen *et al.* 2007).

may be approaching saturation, as seems to be the case in the Southern Ocean (Le Quéré *et al.* 2007) and North Atlantic (Schuster & Watson 2007)⁷.

1.3 Future emissions scenarios

One reason for the range of uncertainties in climate forecasts is that we do not know how much carbon will be emitted in coming decades. Researchers therefore base their calculations on a number of 'emissions scenarios', some assuming humanity makes early and dramatic reductions in greenhouse pollution, whilst others feed more moderate cuts into the computer models. The worst-case scenarios, rather ominously dubbed 'Business as Usual' (BAU), assume that we carry on pretty much as we are, churning out carbon from fossil fuels to sustain a growing world economy. But one observation beginning to alarm climate scientists is that global greenhouse emissions since the turn of the present century have increased at a faster rate than even that assumed by the worst-case scenario (Raupach *et al.* 2007) One recent scientific paper argues that unless we reverse this seemingly remorseless trend within just seven years, and make big cuts in the world's emissions every year thereafter, we have little or no chance of avoiding what scientists have termed 'dangerous' climate change, likely to result if the world's average temperature rises by more than 2 degrees C above pre-industrial levels (Anderson & Bows 2008). In fact, the authors believe that we should prepare ourselves for 4 degrees of warming, a level which the independent committee established by the Climate Change Act recently defined as the threshold of "extreme danger" (Committee on Climate Change 2008). If this worrying trend continues, the range of likely warming effects will have to be revised upward, perhaps dramatically so.

I have summarised the current state of climate change science because I believe that policy-makers do not yet fully appreciate the scale of the challenge we face. Whilst politicians have recently begun to pay lip service to the issue, action remains weak. Indeed in some cases, such as aviation and road building, policy runs contra what is needed to reduce emissions. Of course, the economic landscape looks rather different now than it did a few months ago and doubtless the current disarray will be seen by some at Westminster – and beyond – as an excuse to push climate change still further down the list of political priorities. So while politicians may have begun to 'talk-the-talk', they have thus far signally failed to 'walk-the-walk'. In an article published earlier this year, before the implosion of the world's financial markets, three leading British climate researchers summed up this sense of complacency:

We have lost ten years talking about climate change but not acting on it. A curious optimism – the belief that we can find a way to fully avoid all the serious threats of climate change – pervades the political arenas of the G8 summit and UN climate meetings. This is false optimism, and it is obscuring reality. (Parry *et al.* 2008).

⁷ Anthropogenic carbon emissions currently total 7 billion tonnes of carbon per year (7GtC yr⁻¹) of which approximately 1.7GtC yr⁻¹ are absorbed by the oceans. The net flow of CO₂ from the atmosphere to the oceans represents a small fraction of the total CO₂ flux across the ocean surface (90GtC yr⁻¹) suggesting that the cycle may be very sensitive to environmental change. It is quite possible that as CO₂ levels in the atmosphere increase a significant tipping point will be crossed as the oceans flip from net carbon absorber to net emitter (Turley *et al.* 2006).

Two strands of action are needed to tackle the growing threat of climate change. The first of these, *mitigation*, seeks to attack the root cause of global warming by first reducing the growth in, then reversing, anthropogenic greenhouse emissions. Mitigation is a matter for each of us as individuals and for humanity as a whole. The second strand, *adaptation*, aims to allow us to cope with those effects of climate change which are already either inevitable or highly probable. A policy of adaptation does not represent defeatism, but merely an acceptance that a degree of climate change is inevitable. The earth's climate is possessed of inherent inertia: changes in the chemical constitution of the atmosphere take from decades to centuries, even millennia, to play their way through the system. Even if all global carbon emissions were miraculously to cease overnight, the climatic consequences of the elevated levels of greenhouse gases already in the atmosphere would continue to increase in severity well into the future.

Unfortunately, we are unlikely to break off our love affair with fossil fuels in the near future. But the less we do as a species to wean ourselves off carbon, the more we will have to prepare to deal with the consequences. Adaptation is essential, whether or not we act in concert to reduce emissions, but it is dependent on a realistic assessment of the likely impacts at the local and regional scale at which planning occurs. As we have seen, however, the range of uncertainties is large. Accumulating evidence suggests that impacts are likely to be serious and damaging – and we cannot exclude the possibility of runaway climate change with truly apocalyptic consequences.

2. The Economics Of Climate Change

Planned adaptation to climate change requires a proper discounting of the future: policy-makers and society in general need to consider the economic costs and benefits of short and medium term policy decisions in the light of the cost to future generations. The Stern Review has been criticised by some commentators, most notable amongst whom is the Yale economist William Nordhaus (2007), for its adoption of a relatively low (1.4 percent) time discount rate in weighing up the present and future costs of climate change mitigation. Critics claim that we need to assign considerably more weight to our own needs than to those of future generations who do not yet exist and who, they argue, will be better placed economically to deal with the consequences of climate change.

2.1 Climate change and morality

Nordhaus takes issue with Stern's assumption of a utilitarian ethical dimension in calculating his discount rate. The central question here of the relative weightings we should apply to our own social and economic welfare versus that of future generations yet unborn is one for moral philosophers but, for reasons I shall outline, my own view is that Stern is correct.

Economists are unused to dealing with existential crises, the costs of which extend beyond what can be measured in purely economic terms. As events of the past year or so have demonstrated, the global economy is neither as stable nor as

resilient, even to internally generated insults, as many had come to believe: the regional impacts of climate change – rising temperatures, shifting rainfall patterns, de-glaciation and so on – are likely to bring unprecedented economic disruption in their wake. But more than this, the wrong decisions now may bring into doubt the long-term persistence of the human species.

Prioritarian philosophers might argue that in the most extreme climate change scenarios – those which lead to a catastrophic collapse of the human population or even extinction – the loss of all succeeding generations is in fact cost-free. The economist and moral philosopher John Broome (2008) adopts a utilitarian stance but nonetheless expresses this prioritarian point succinctly: “If non-existence is a harm, it is a harm suffered by nobody, since there is nobody who does not exist. How can there be a harm that harms nobody?” There are, however, a range of possible outcomes of unmitigated climate change which fall short of extinction, but which will nevertheless involve enormous costs in terms of human misery. Even in the case of actual extinction, billions of *living* people would doubtless suffer as their lives were cut short. It seems to me only right therefore that we consider the potential for such harm brought upon our descendants in our decision-making processes.⁸

2.2 ‘The Wealth of [future] Nations’

Catastrophic outcomes aside, Nordhaus argues for a high rate of discount on the grounds that future generations will be more affluent and thus better able to afford whatever costs climate change might impose. Stern, however, responds that without action to limit climatic change now, the costs arising will increase dramatically in the future (*Prospect* 2008). Nordhaus assumes *a priori* growth in national and per capita GDP continuing indefinitely far into the future. Yet there is, it seems to me, no fundamental law of economics which demands continued growth; there is, as it were, no ‘arrow of wealth’ pointing fixedly in the upward direction⁹. One might argue on inductive and empirical grounds, of course, that Nordhaus’s assumption constitutes a not unreasonable working hypothesis for, with the exception of a few temporary recessionary blips, the trend since the industrial revolution has indeed been one of unbroken economic growth and increasing per capita wealth. But there are, as statisticians are frequently at pains to remind us, dangers in extrapolating too far from a linear trend.

During the next century or two, it is likely that humanity will come face to face with a global, existential crisis.¹⁰ The burden placed on the world economy by

⁸ This notion is not without precedent. The post-war generations are familiar with the concept of a debt owed by us to the wartime generations. That suggests that we accept the existence of inter-generational currency, of the exchange of moral and economic capital on the basis of things done before we existed. If earlier generations can be owed a debt by their descendants then, cannot the debt flow in the opposite direction?

⁹ I have written elsewhere (2007) of what I have termed the ‘central dogma’ of modern political life: economic growth is good; more economic growth is better; limitless economic growth is best of all. Since the birth of agriculture 10,000 years ago, economic growth has been linked to our capacity to harvest the earth’s natural resources. But we now find ourselves bumping against the buffers of planetary finitude. We urgently need to find ways of sustaining our economies without raping the natural environment or, alternatively, accept life with less.

¹⁰ There is evidence from history that successful economies can indeed succumb in the face of environmental stresses – sometimes self-imposed as appears to be the case the prehistoric inhabitants of Cont’d on p.7

climate change and its effects will be substantial and pervasive. Economies, it is now clear, are not the well-behaved, mathematically predictable, linear entities that Adam Smith envisaged. Rather, they behave as chaotic systems in a manner somewhat analogous to that of climate itself. In the case of economics, however, there is a further complicating factor: people often behave *irrationally*, in ways which are contrary to their own and the collective interests.¹¹ Applying the lessons of chaos theory then, it seems to me quite conceivable that economies might undergo dramatic changes of state given sufficient forcing from the environment. We cannot, I would argue, assume that our theories of the behaviour of economies will continue to hold true in such unprecedented and radically challenging circumstances as we are likely to face as this century progresses. Given the large uncertainties, the systemic potential for abrupt shifts in regional climatic equilibria or even runaway climate change on a global scale, I find Stern's analysis the more compelling.

2.3 Discounting the local future

This discussion might appear esoteric, abstract even, in the context of this paper. Yet time discounting is as relevant a factor in local planning decisions as it is at the scale of global economics. Calculations of the relative weighting of short-term gain versus future costs are ones which policy-makers, and indeed all of us, make all the time. It is human nature, it seems, to apply a relatively high time discount giving overwhelming weight to short term gains over long-term costs.

Consider, for example, the subject of road building. The research evidence clearly shows that building new roads and increasing the capacity of existing ones does not, in the long run, alleviate traffic congestion. In fact, road use appears simply to increase to meet the available space, so that environmental problems associated with road transport increase in totality to no long-term economic advantage. Indeed one might argue that this practice comes with a significant economic downside, because money spent in a futile chase after road space could have been put to use more profitably elsewhere on the transport infrastructure. We know this yet we continue to build roads because each scheme appears to offer a solution to an immediate problem.

Local planning decisions on where, or even whether, to build must include consideration of all economic, social and environmental costs – including those

Cont'd from p.6 Easter Island, sometimes climate-related as in several cases in Mesoamerica. Europe faced its own regional existential crisis during the Black Death of the fourteenth century. Throughout that century the long-term growth in total GDP seems to have gone into reverse. In some parts of Europe at least, economic (principally agricultural) output seems to have collapsed under the onslaught of disease. Indeed, it was not until the sixteenth century that national GDPs recovered to their 1300 levels.

¹¹ Readers who take issue with this statement should consider the recent behaviour in the world's financial markets. Note, for example, the continuing run on the Northern Rock bank even after the government had guaranteed savings. In this respect, economies diverge from complex systems in the physical world: whilst complex physical systems behave in ways which are non-predictable in practice (see Footnote 3), in principle their evolutions are entirely Newtonian and deterministic. In the case of economics, however, the tendency of individuals to behave irrationally from time to time introduces a *fundamental* indeterminacy. It is the combination of classical complexity and the fundamental indeterminacy of human behaviour which, it seems to me, has foiled the attempts of neoclassical economists to establish the discipline as a rigorously mathematical science in the way in which Galileo and Newton did for physics.

likely to be incurred by future generations. In relation to the potential for flooding, decisions should also take into account increasing risk with time.

At this point we need to pause and think about what we mean when we talk in terms of risk. The risk associated with an adverse event is not a simple correlate of its probability of occurring. Rather, risk represents the product of the probability times the costs incurred if the event occurs. The risk associated with an event might be deemed high even if its probability of occurring within a given time-frame is low, if the consequences (and time-discounted costs) of its doing so are disastrous.¹² Conversely, a high-probability event with negligible costs can be considered a low risk. The costs of serious flooding are high both in economic and human terms; as recent events demonstrate, homes can be wrecked, lives can be lost. The likelihood of serious flooding occurring on areas of the floodplain is high (typically 1 percent in any given year), a probability which is almost certain to increase in response to climate change and changes in land use.

It is the way of things in politics that economics – and especially short-term economics – tends to trump all other considerations. Ultimately, though, we all depend on the natural environment for our survival. Thus a short-term economic gain may turn out to be a long-term economic own-goal. The example of road building is instructive here: building homes on flood land may offer a way out of an immediate perceived economic bind, but if floods render those homes uninsurable or uninhabitable or, worse still lead to loss of life, then any short-term economic advantage vanishes. As climate change begins to bite therefore, long-term economic priorities must be assessed in the light of, and brought into convergence with, the requirements of the environment.

3. Flood Risk And Local Development

On 3 November 2000, following days of unprecedented heavy rain, the highest floods ever recorded on the River Ouse inundated more than a hundred homes in the Selby area. Many of the worst-affected properties were in an estate only recently built in the shadow of the earthwork barrier banks, on the floodplain at Barlby. There were many lessons to be learned from these events, among the more obvious of which was that building on greenfield land on the floodplain can put homes at increased and unnecessary risk of flooding.

3.1 The Bondgate/Monk Lane proposal

It is, to say the least, perplexing that consideration is now being given to the construction of a thousand homes on land very similar to that at Barlby which suffered so badly just 8 years ago. But this is what is proposed, albeit provisionally, in the Core Strategy Development Plan (Selby District Council 2008), which

¹² 65 million years ago an asteroid wiped out the dinosaurs and 70 percent of the species then alive. Estimates suggest that such an impact has occurred on average once every 100 million years. The odds against a similar impact occurring in any given year therefore are 100 million to 1 – quite literally astronomical. But the consequences of an extraterrestrial strike on this scale would be truly cataclysmic. Thus the risk (probability times cost) is sufficiently high for scientists to have begun to give serious consideration to ways of averting it.

lists just such a location as one of six potential sites for a major housing development. It is argued that building on fields adjacent to the Holmes Dike and the residential areas of Bondgate and Monk Lane could help to meet the district's requirements for new housing in the next 15 years. Yet this is an area of low-lying farmland, encircled by a tidal river and by a main drainage channel that traces the ancient course of that same river. That land, moreover, borders existing flood-prone houses and was itself submerged under several feet of water in 1947, 1982 and again in 2000.

The Bondgate/Monk Lane site is located in a high-probability 100-year floodplain designated Flood Zone 3a (FZ3a) in the Strategic Flood Risk Assessment (Selby District Council 2008a). The FZ3a designation is applied to land with at least a 1 percent probability of flooding in any given year and is therefore considered generally unsuitable for residential development. General planning guidelines are laid out in Planning Policy Statement 25 (PPS-25) (Department for Communities and Local Government 2006):

Only where there are no reasonably available sites in Flood Zones 1 or 2 should decision-makers consider the suitability of sites in Flood Zone 3, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required. (p.21).

In relation to any proposal to develop in FZ3a, the Exception Test requires that:

- i. it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk; and
- ii. the development should be on developable previously-developed land or, if it is not on previously developed land²⁴, that there are no reasonable alternative sites on developable previously-developed land; and
- iii. the FRA must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

The one-percent annual flood risk assessment for the Bondgate/Monk Lane site is based on historical flood records. Although the site has benefited from recent improvements to the town's flood defences, the risk assessment does not take into account the likely future effects of climate change. Records show that floods on the Ouse have become higher and more frequent in recent decades. This increase seems to be largely the result of changes in land-use throughout the Ouse basin and predates – and is independent of – the effects of global climate change (Lane 2003).

3.2 Local climate impacts

It is likely¹³ that Europe has experienced significant anthropogenic warming in the past 50 years (IPCC 2007). In the UK, Central England Temperature (CET) – the longest continuous temperature record in existence, dating back to 1659 – has risen by 1 Celsius degree since 1980. Temperature increase has been greatest in the winter months: in the Yorkshire and Humber region, mean daily winter temperature increased by 1.9 degrees between 1961 and 2006 (Jenkins *et al.* 2007).

¹³ Probability > 66 percent.

IPCC (2007, pp. 255-8) AR4 notes a statistically significant trend of increased annual precipitation across northern Europe beginning around 1980. However, this observation is not (thus far) reflected in the UK, where annual precipitation has remained rather stable over the past century.¹⁴ Although annual rainfall has not increased in the UK, a trend of increasing seasonality *has* been observed: winters are now wetter relative to summers than at any previous time in the 240-year instrumental record. There has, moreover, been a significant increase in the proportion of winter precipitation falling in intense rainstorms, a trend which has been particularly noticeable in north-eastern England (Maraun *et al.* 2007). One might argue, of course, that this simply represents natural climatic variation but the observation is nonetheless consistent with the predictions of numerical modelling of the effects of global warming in the Britain: the UK Climate Impacts Programme (UKCIP) forecasts that while our summers will become significantly drier on average over the coming century, winter rainfall in our region will increase in both volume – by up to a third by 2080 – and intensity (Hulme *et al.* 2002, pp. 28-41).

3.3 Climate and flood risk

If the volume of rain falling during the winter months increases significantly, soils both in the upper catchments and in the lower river basins are likely to be at or close to saturation throughout the season. Coupled with the predicted increase in rainfall intensity, episodic rapid rises in river-levels and a concomitant increase in the risk of damaging floods seem inevitable. High-resolution models suggest that changes in patterns of precipitation will translate into a five- to ten-fold increase in the risk of flooding on the Ouse by 2090 (WS Atkins 2002, p.32). At the top end of this scale of risk, the odds against a typical FZ3a floodplain flooding in any given year may fall from 100-1 to a mere 10-1. On average, then, such a site might be expected to be inundated on the order of once per decade by the late-21st century.

The Ouse at Selby, moreover, is tidal and will thus be further affected by the inevitability of rising sea-level and by a possible increase in the frequency and severity of North Sea storm surges, which act to push water up the tidal reaches onto the riverine floodplain. The UKCIP (2007) predicts a net rise in sea-level at the mouth of the Humber of as much as 77 cm by 2080, a combined result of rising global sea-level and the long-term isostatic subsidence of the south-eastern part of the British mainland. The IPCC's estimates of global sea-level rise, upon which the UKCIP calculation is based, assume the major contribution will come from thermal expansion of the oceans, in part because the dynamics of ice sheet melting – a potentially much bigger cause of sea-level rise – are poorly understood. However, recent data suggest that the vast ice sheets covering Greenland and West Antarctica are melting much faster than anyone had previously thought

¹⁴ We ought not to regard this fact as in any sense undermining of climate change science in general or of numerical modelling in particular: it simply illustrates the difficulty in disentangling the long-term global climate signal from the short-term, local variability due to natural climatic cycles such the North Atlantic Oscillation (NAO).

possible.¹⁵ On the basis of studies of past climatic change, NASA's James Hansen and several other leading climate scientists have argued that a sudden non-linear collapse of the ice this century cannot be ruled out, with the concomitant risk of a change in sea-level of the order of several metres per century (Hansen *et al.* 2007). Hansen has claimed (2007) that "a 'scientific reticence' is inhibiting the communication of a threat of a potentially large sea level rise." Recent, somewhat more conservative, research places constraints on the extent of global sea-level rise taking both hydrothermal and glaciological factors into consideration: the bad news is that the calculated upper bound is a rise of 2 metres by 2100 (Pfeffer *et al.* 2008).

An increase in the frequency and severity of flooding is unavoidable, but the worst effects can at least be alleviated by sensible local development decisions. Unwise development, on the other hand, will compound the risks still further. A 2004 study by the government's Office of Science and Technology identified urbanisation – building on previously greenfield sites – as one of the more significant compounding factors (Evans *et al.* 2004). Amongst other effects, for example, replacing farmland and other green spaces with tarmac and concrete dramatically increases the rate of rainwater runoff into the watercourses: typically 70 per cent of the rain falling on impermeable surfaces finds its way immediately into the drains and rivers. Increased runoff in turn increases the speed at which river levels rise, making serious flooding more likely.

The effects of climate change will force us to view our riverine systems and the way we manage them in a radically different light. To some extent increased flood risk can be balanced by improved flood alleviation schemes (and indeed, since 2000 Selby's river defences have, at considerable expense, been upgraded). Paradoxically, however, the OST also cautions that improving flood defences may actually *increase* flood risk if it encourages further inappropriate development on the floodplain. Flood management has traditionally centred around engineering solutions – canalisation, the construction of culverts and barrier walls, and so on – but these too can make problems worse elsewhere. In the more challenging world ahead a new approach will be needed involving the setting aside of agricultural land as floodwash zones, perhaps even the abandonment of some land, as well as engineered defences. And much tighter restrictions on building and urbanisation are essential. The OST report (Evans *et al.* 2004a p. 224) notes:

Targeting pathways near source, especially in the rural and urban catchment through, for example, catchment-wide storage, reduces the probability of flooding downstream... Targeting receptors, especially through land-use planning, reduces the consequence of flooding... There is the potential to build a long-term solution to the problem by targeting people, industries and built environments – the receptors of flooding. There is, however, an obvious tension here for current policy-makers.

The dangers of developing a high-risk, greenfield location like the Bondgate/ Monk Lane site can be seen, therefore, to be threefold. First is the rather obvious danger to those who move into homes in such a development – the risk to life, limb and property if a flood occurs. Second, is the probability of making flooding more likely elsewhere as a result of increased runoff. Finally, and also exacerbat-

¹⁵ See also Footnote 6.

ing the general flood risk, is the loss of potentially valuable, flood-alleviating washland.

4. Postscript

A thousand years ago, a Norse king sat on the foreshore at Southampton and demonstrated to his sycophantic courtiers that even he, Cnut, master of all England, could not still the waves. The story may be apocryphal, but it has a kernel of wisdom. In the centuries since Cnut, mankind has harnessed engineering ingenuity to achieve some of what he could not. But, as the residents of Barlby know to their cost, there are limits to our ability to bend the forces of nature to our will – be they the titanic global forces which govern our climate or the more local, but still devastating, tantrums of our streams and rivers. Whether we like it or not, damaging floods will become an increasingly common feature of our lives in the years that lie ahead. Whatever the economic and social benefits of increasing Selby's stock of housing, high risk areas of the floodplain are not the place to do it. The problems of flooding are not peculiar to the Bondgate/Monk Lane site: the arguments I have put forward could apply equally well to many locations in the Ouse basin. The events of autumn 2000, and others elsewhere across the country since, demonstrate the vulnerability of the built environment – our homes, schools, places of work and the infrastructure that binds them together – to the forces of nature. The lessons are there to be learned.

MDS

References

- Alley, R. B., J. Marotzke, W. D. Nordhaus, J. T. Overpeck, D. M. Peteet, R. A. Pielke Jr., R. T. Pierrehumbert, P. B. Rhines, T. F. Stocker, L. D. Talley, J. M. Wallace. 2003. Abrupt climate change. *Science* **299**, 2005-10. [doi:10.1126/science.1081056]
- Anderson, K. A., & A. Bows. 2008. Reframing the climate change challenge in light of post-2000 emission trends. *Phil. Trans. R. Soc. A* **366**, 3863–3882. [doi:10.1098/rsta.2008.0138]. Also available at www.tyndall.ac.uk/publications/journal_papers/fulltext.pdf.
- Broome, J. 2008. The ethics of climate change. *Sci. Am.* **298** (6), 69-73.
- Chen, J. L., C. R. Wilson & B. D. Tapley. 2006. Satellite Gravity Measurements Confirm Accelerated Melting of Greenland Ice Sheet. *Science* **313**, 1958-60. [doi:10.1126/science.1129007].
- Committee on Climate Change. 2008. *Building a low-carbon economy: The UK's contribution to tackling climate change, The First Report of the Committee on Climate Change*. London: The Stationery Office. P.16. hmccc.s3.amazonaws.com/pdf/TSO-ClimateChange.pdf.
- Department for Communities and Local Government. 2006. *Planning Policy Statement 25: Development and flood risk*. London: The Stationery Office. Annex D, 21-29. www.communities.gov.uk/documents/planningandbuilding/pdf/planningpolicystatement25.pdf
- Elliott, J. 2008. Antarctic ice shelf 'hangs by a thread'. British Antarctic Survey Press Release 10/2008. www.antarctica.ac.uk/press/press_releases/press_release.php?id=376.
- Evans, E., R. Ashley, J. Hall, E. Penning-Rowsell, A. Saul, P. Sayers, C. Thorne, & A. Watkinson. 2004. *Foresight. Future Flooding. Scientific Summary: Volume I: Future risks and their drivers*. London: Office of Science and Technology.

- Evans, E., R. Ashley, J. Hall, E. Penning-Rowsell, P. Sayers, C. Thorne, & A. Watkinson. 2004a. *Foresight. Future Flooding. Scientific Summary: Volume II: Managing future risks*. London: Office of Science and Technology.
- Hansen, J. E. 2007. Scientific reticence and sea level rise. *Environ. Res. Lett.* **2** 024002, 1-6. [doi:10.1088/1748-9326/2/2/024002]. Also available at stacks.iop.org/ERL/2/024002.
- Hansen, J. E., M. Sato, P. Kharecha, G. Russell, D. W. Lea & M. Siddall. 2007. Climate change and trace gases. *Phil. Trans. R. Soc. A* **365**: 1925-54. [doi:10.1098/rsta.2007.2052].
- Hulme, M., G. J. Jenkins, X. Lu, J. R. Turnpenny, T. D. Mitchell, R. G. Jones, J. Lowe, J. M. Murphy, D. Hassell, P. Boorman, R. McDonald, & S. Hill. 2002. *Climate Change Scenarios for the United Kingdom: The UKCIP02 Scientific Report*. Norwich: Tyndall Centre for Climate Change Research, School of Environmental Sciences, University of East Anglia. www.ukcip.org.uk/images/stories/Pub_pdfs/UKCIP02_tech.pdf.
- IPCC, 2007. *Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller (eds.)]. Cambridge: Cambridge University Press.
- Jenkins, G. J., M. C. Perry & M. J. O. Prior. 2007. *The climate of the United Kingdom and recent trends*. Exeter, UK: Met Office Hadley Centre. www.ukcip.org.uk/index.php?option=com_content&task=view&id=469&Itemid=477.
- King, D. A. 2004. Climate Change Science: Adapt, Mitigate, or Ignore? *Science* **303**, 176-7. [doi: 10.1126/science.1094329].
- Lane S. N. 2003. More floods less rain? Changing hydrology within a Yorkshire context. In: Atherden, M. (Ed.) *Global Warming: A Yorkshire Perspective*. York: PLACE, 35-70. www.therrc.co.uk/pdf/References/Lane_2003.pdf.
- Le Quéré, C., C. Rödenbeck, E. T. Buitenhuis, T. J. Conway, R. Langenfelds, A. Gomez, C. Labuschagne, M. Ramonet, T. Nakazawa, N. Metzl, N. Gillett & M. Heimann. 2007. Saturation of the Southern Ocean CO₂ Sink Due to Recent Climate Change. *Science* **316**, 1735-1738. [doi:10.1126/science.1136188].
- Maraun, D., T. J. Osborn & N.P. Gillett. 2007. United Kingdom daily precipitation intensity: improved early data, error estimates and an update from 2000 to 2006. *Int. J. Climatol.* **28**, 833-42. [doi:10.1002/joc.1672]. Also available at www.cru.uea.ac.uk/~nathan/pdf/joc1672.pdf.
- Mercer, J.H. 1978. West Antarctic ice sheet and CO₂ greenhouse effect: a threat of disaster. *Nature* **271**, 321-5. [doi:10.1038/271321a0].
- Monastersky, R. 2008. Arctic warming spurs record melting. *Nature*. Published online 17 December [doi:10.1038/news.2008.1314].
- Nordhaus, W. D. 2007. The Stern Review on the Economics of Climate Change. NBER Working Paper No. W12741. Available at ssrn.com/abstract=948654.
- Parry, M., J. Palutikof, C. Hanson & J. Lowe. 2008. Squaring up to reality. *Nature Reports Climate Change* **2**, 68-71. [doi:10.1038/climate.2008.50].
- Pfeffer, W. T., J. T. Harper & S. O'Neel. 2008. Kinematic Constraints on Glacier Contributions to 21st-Century Sea-Level Rise. *Science* **321**, 1340-3. [doi:10.1126/science.1159099].
- Prospect. 2008. Nicholas Stern: Interview with Alun Anderson. **148** July, 28-32. www.prospect-magazine.co.uk/article_details.php?id=10256
- Raupach, M. R., G. Marland, P. Ciais, C. Le Quéré, J. G. Canadell, G. Klepper, and C. B. Field. 2007. Global and regional drivers of accelerating CO₂ emissions. *Proc. Nat. Acad. Sci. U.S.A.* **104**, 10288-93. [doi:10.1073/pnas.0700609104].
- Rigby, M., et al. 2008. Renewed growth of atmospheric methane. *Geophys. Res. Lett.* **35**, L22805. [doi:10.1029/2008GL036037].
- Scambos, T. A., J. A. Bohlander, C. A. Shuman & P. Skvarca. 2004. Glacier acceleration and thinning after ice shelf collapse in the Larsen B embayment, Antarctica. *Geophys. Res. Lett.*, **31**, L18402. [doi:10.1029/2004GL020670].
- Schuster, U., & A. J. Watson. 2007. A variable and decreasing sink for atmospheric CO₂ in the North Atlantic. *J. Geophys. Res.* **112**, C11006. [doi:10.1029/2006JC003941].

- Selby District Council. 2008. Local Development Framework: Core Strategy Development Plan Document, Further Options Report. www.selby.gov.uk/upload/Core_Strategy_development_Plan_081105.pdf.
- Selby District Council. 2008a. Strategic Flood Risk Assessment map. www.selby.gov.uk/upload/081125_Map_Selby_SFRA.pdf.
- Serreze, M. J. & J. C. Stroeve. 2008. Standing on the brink. *Nature Reports Climate Change* **2**, 142-3. Published online 9 October 2008. [doi:10.1038/climate.2008.108].
- Smith, M. D. 2007. Understanding the real world. *Science & Public Affairs*, June, 27.
- Stern, N. H. 2006. *Stern Review: The Economics of Climate Change*. London: HM Treasury. www.hm-treasury.gov.uk/sternreview_index.htm
- The Guardian*, 2008. I underestimated the threat, says Stern. 18 April. www.guardian.co.uk/environment/2008/apr/18/climatechange.carbonemissions.
- Turley, C., J. C. Blackford, S. Widdicombe, D. Lowe, P. D. Nightingale & A. P. Rees. 2006. Reviewing the impact of increased atmospheric CO₂ on oceanic pH and the marine ecosystem. In: Schellnhuber, H. J., W. Cramer, N. Nakicenovic, T. Wigley, & G. Yohe. *Avoiding Dangerous Climate Change*. Cambridge: Cambridge University Press, pp. 65-70.
- UKCIP. 2007. Updates to regional net sea-level change estimates for Great Britain. www.ukcip.org.uk/images/stories/Scenarios/UKCIP02extras/slr_estimates.pdf.
- WS Atkins. 2002. *Warming up the region: The impacts of climate change in the Yorkshire and Humber Region*. WS Atkins report no: AK2970.068. Epsom. www.ukcip.org.uk/images/stories/Pub_pdfs/Y%26H_tech.pdf.
- Zwally, H. J., W. Abdalati, T. Herring, K. Larson, J. Saba & K. Steffen. 2002. Surface melt-induced acceleration of Greenland ice-sheet flow. *Science* **297**, 218-22. [doi:10.1126/science.1072708].

CS/CFO / 159

caroline sampson

AUC 22/1/09

From: Martin D Smith [mdsmith.1957@tiscali.co.uk]
Sent: 13 January 2009 15:20
To: caroline sampson
Subject: Re: Core Strategy - Further Options Response

Dear Ms. Sampson,

I should be grateful if you would treat my submission as a formal response to the consultation. As I mentioned in my covering message to councillors, I was only indirectly made aware of the consultation at a late stage in the proceedings. Given the long-term significance of the proposals, and the time needed to gather together and digest the relevant literature, I did not feel that I could do the matter justice any sooner.

I was unable to locate a return address for responses to the LDF team, but I did nonetheless also wish to address councillors directly.

In the circumstances, I hope that councillors will see fit to consider all relevant responses.

Best regards,

Martin Smith

Dear Mr Smith

Cllr Mackman has passed on to the LDF Team a copy of your e-mailed response to the Core Strategy - Further Options consultation. As this response is addressed to Members of the Planning Committee and Selby North Councillors, I would initially like to clarify if you would like this to be treated as an official response to the consultation, or if you intend to simply target the Councillors mentioned? If you would like the response to be processed as a response to the LDF team, then I have to alert you to the fact that the 6 week consultation period ended on 18 December, therefore this will be considered a late response - and Councillors will soon decide if they wish to allow the number of late submissions we received to be considered along with those received on time.

I would be please to hear your response to this at your earliest convenience.

Regards - Caroline

Caroline Sampson Paver
Senior Planning Officer (LDF Team)
Selby District Council

Tel: 01757 292115
Fax: 01757 292 090

The information in this e-mail, and any attachments, is confidential and may be subject to legal professional privilege. It is intended solely for the attention and use of the named addressee(s). Its contents do not necessarily represent the views or opinions of Selby District Council. If you are not the intended recipient please notify the sender immediately. Unless you are the intended recipient, or his/her representative, you are not authorised to, and must not, read, copy, distribute, use or retain this message or any part of it.

Selby District Council, Civic Centre, Portholme Road, Selby, North Yorkshire, YO8 4SB
DX 27408 Selby

13/01/2009