

Our ref: General 40b – Planning Conformity/final responses/local development frameworks/Selby, Further Options Core Strategy, Dec 08

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Dear Terry

**Selby District Local Development Framework - Core Strategy
Consultation on Further Options**

The Yorkshire and Humber Assembly (as the Regional Planning Body) welcomes the opportunity to comment on the Selby Core Strategy – Further Options document and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Regional Planning Body's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is published prior to being submitted to the Secretary of State a formal Regional Planning Body view on its general conformity with the Regional Spatial Strategy will need to be requested (Regulation 29, 2008).

The following officer comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008.

The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

Key Points on the Core Strategy: Further Options

Below is a summary of the main points the Assembly wishes to raise with regards to the Core Strategy: Further Options document. Annex A provides further detail for each of these issues.

1. Need to set out the requirement for the Core Strategy to be in general conformity with the RSS (2008).
2. Welcome reference to the fact that the RSS (2008) sets an overall housing requirement for Selby but stress the need to see this figure as a 'floor' and not a 'ceiling'.
3. Welcome paragraphs 3.4 and 3.5 that highlight that the RSS (2008) directs that the focus of growth within the District should be Selby.
4. Pleased to see that the issue of affordable housing has been covered in the Further Options document.
5. Would welcome reference to Policy ENV1 of RSS (2008).
6. Would welcome a reference to renewable energy targets as set out in RSS (2008).
7. Encouraged that the issue of housing mix is covered in this document.
8. Note the use of your own Gypsy and Traveller Accommodation Assessment in deriving more locally representative figures.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you continue to prepare the Core Strategy for submission. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy and we look forward to discussing the points we raise here further when we meet with you in the New Year.

Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy and to commenting on the final document in due course.

Yours sincerely



Jenny Poxon
Head of Service
Planning Delivery and Conformity

Annex A

General Comments

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

There is a need to set out the requirement for the Core Strategy to be in general conformity with the RSS; it would be helpful if this were set out at the start of the document. The Assembly welcomes references made throughout the document to RSS (May 2008) and welcomes the regional planning policy context that is set out throughout the document. Paragraph 1.15 provides a sound explanation of the partial review of the RSS that is currently being undertaken by the Assembly.

Housing

Scale of New Housing

The Assembly is encouraged that **paragraph 3.2** makes reference to the fact that the RSS (2008) sets an overall housing requirement for Selby between the years 2004 and 2026 of achieving at least 9,480 dwellings. Table 12.1 in RSS (2008) sets an annual average net addition to the dwelling stock in Selby of 440 units between 2008-2026.

Paragraph 3.3 highlights that between 2004-2008 there was an overprovision of housing built in the Selby District. In calculating the Housing Trajectory for the Core Strategy you are right to 'start the clock' at the RSS base date of 2004 and take account of the housing delivery in the period 2004-8. However because Policy H1 of RSS (2008) is now effectively a floor target you are likely to be challenged if you seek to apply it as a ceiling, which is what you appear to have done. This aspect of the housing policy is set out in Policy H2 of RSS - Section B bullet point 5. We think you need to be more flexible and that your housing delivery should be informed by the opportunities there are to deliver development in locations that deliver the Plan's Core approach and sub area policies as set out in Policy H2.

In addition we are a little confused by the statement regarding unimplemented planning permissions. In your Core Strategy document you refer to unimplemented permissions for 2637 units yet in your Annual Monitoring Report return to us in October this year you included a figure of 1221. We need to know fairly urgently which is the correct figure? And does either figure include an allowance for permissions that expire without being implemented?

Distribution of New Housing

Policies in RSS (2008) seek to focus development on the region's town and city centres. The Core Approach (Policies YH1-YH9) makes it clear that most new development, and high trip generating uses, should be focused on Regional Cities and Sub-Regional Cities and Towns and that away from these sufficient development should be permitted in Principal Towns to enable them to fulfil their role as service centres. Selby is identified in RSS as a Principal Town. Policy YH5 of RSS states that Principal Towns should be the main local focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region. Policy LCR1 A emphasises the importance of strengthening the service centre roles of Principal Towns of which Selby is identified as one. Policy Y1 also emphasises the importance of supporting the role of Selby as a Principal Town.

The Assembly is encouraged that **paragraph 3.4 and 3.5** clearly highlights that the RSS directs that the focus of growth within the District should be Selby, as the Principal Town, and that Local Service Centres should provide a focus for more locally orientated development.

The Assembly supports the proposed settlement hierarchy and development approach. **Paragraph 3.9** is welcomed which focuses new market housing in Selby and limits development in the remainder of the District. The document also rightly highlights Tadcaster and Sherburn in Elmet as Local Service Centres identified in RSS (2008) as locations where local services should be retained and improved, economic diversification encouraged and where local housing needs for both market and affordable housing should be met.

In **Paragraph 3.12** we welcome reference to the Regional Settlement Study that has clearly been used as a starting point for the proposed settlement hierarchy. We are encouraged that a clear and robust methodology that will feed into the evidence base has been used to assess the sustainability of the smaller settlements for future development in Background Paper No.5 – Assessing the Relative Sustainability of Smaller Rural Settlements in Selby District.

The Assembly is also encouraged that **paragraph 3.24** specifies that the Council's intention is not to make any more housing allocations within the Secondary Villages, other than those specifically to provide 100% affordable housing, to meet an identified local need. This is in accordance with the Core Approach in RSS (2008).

To reflect the above, the Assembly would have expected the % distributions in **Table 1** to be more skewed towards Sherburn in Elmet and Tadcaster than the primary and secondary villages.

We are pleased to see that the issue of affordable housing has been covered in the Further Options document. The Assembly welcomes **paragraph 3.50** that makes reference to the RSS affordable housing target for North Yorkshire. The Regional Housing Strategy 2005 identifies affordable housing need in the North Yorkshire districts as being 'high'. Policy H4 of RSS states that LDFs should set targets for the amount of affordable housing to be provided. Provisional estimates of the proportion of new housing that may need to be affordable in North Yorkshire are over 40%. **Paragraph 3.49** makes reference to the Strategic Housing Market Assessment that the Council is commissioning; this will be an important tool in helping to determine how the Core Strategy will be delivered.

Economy

The Assembly is encouraged that **paragraph 4.4** emphasises the need to foster regeneration and to strengthen and diversify the local economy in Selby. Policy Y1B of RSS (2008) emphasises the importance of delivering economic growth at Selby in line with its role as a Principal Town.

The Assembly is aware that the Burn Airfield site has been identified by Yorkshire Forward as a strategically important employment site and it is stated in the document that the site was put forward as a potential site for European Spallation Source (ESS) project – a high technology science based research installation. Since this specific end user is no longer going to take up the site, the Assembly would like concerns over its use as a general employment site to be noted given its location and flood risk issues. If it is retained on the portfolio as a regionally significant site for a single end user then its suitability should be reassessed if such an end user comes forward.

Environment/Natural Resources/Climate Change

The Assembly is encouraged that the document emphasises the need for the environmental policies to cover flood risk management. Flood risk is clearly a major issue for Selby so it will be imperative that reference is made to the recently published Strategic Flood Risk Assessment (November 2008) as this will be an important tool in helping to determine how the Core Strategy will be delivered.

It is also worth noting that Policy ENV1 of RSS (2008) emphasises that 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. It also highlights that flood management will be required in Selby where there is little development land available outside high flood risk zones.

The document clearly identifies the need for the Core Strategy to contain environmental policies that support renewable energy projects. Policy ENV5 of RSS (2008) states the Region will maximise improvements to energy and efficiency and increase renewable energy capacity. Plans, strategies, investment decisions and programmes should promote and secure greater use of decentralised and renewable or low carbon energy in new developments, including through Development Plan Documents setting ambitious but viable proportions of the energy supply for new developments to be required to come from such sources.

The document states that the Core Strategy will ensure that a proportion of the energy needs of major residential/industrial/commercial/leisure proposals are derived from on-site renewables or through other genuine decentralised, renewable and low carbon sources. The Assembly supports Question 9, which provides that approximately 10% of the energy requirements of major development schemes should be produced from on-site renewables or from other decentralised renewables or low carbon supplies.

The Assembly would also encourage the document to make reference to renewable energy targets as set out in RSS (2008). Policy ENV5 of RSS (2008) sets North Yorkshire a target of at least 209MW by 2010 and 428MW by 2021 for installed grid connected renewable capacity. Table 10.2 recommends a renewable energy target in Selby of 14MW to 2010 and 32MW to 2021.

Sustainable Communities

The Assembly is encouraged that the issue of housing mix is covered in this document. Policy H5 in RSS (2008) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation of more sustainable communities. The Policy recommends that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix that reflects the needs of the area, including homes for families with children, single persons, and older persons, to create sustainable communities.

The Assembly is encouraged that the Core Strategy addresses the issue of Gypsies and Travellers. The RSS (2008) recommends that the region needs to make additional provision to meet the needs of Gypsies and Travellers to address a shortfall of least 255 pitches. Policy H6 states that in the North Yorkshire district at least 57 pitches will be required by 2010 to address the shortfall in the region. Policy H6 also requires local authorities to carry out an assessment of the needs of Gypsies and Travellers by May 2008.

Policy H6 was therefore set as an interim policy until all local authorities had carried out their own local assessments. The estimates set out in Policy H6 will be superseded by the findings of local Gypsy and Traveller accommodation assessments which are expected to conclude that greater numbers of additional pitches will be required.

The Assembly welcomes the reference made in **paragraphs 6.11 and 6.12** to the *Gypsy and Traveller Accommodation Assessment – North Yorkshire Sub Region (May 2008)*, which identifies a need for 55 additional pitches in the North Yorkshire sub region in the period up to 2015, of which 20 are required in the Selby District. This overall North Yorkshire figure is clearly lower than that anticipated in the RSS.

The Assembly has commissioned consultants to review the local accommodation assessments that have been carried out by local authorities. When the final report is published we will be able to make further detailed comments on this issue.