

Our ref: General 40b – Planning Conformity/final responses/local development frameworks/selby issues Jun 06

3 July 2006

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Dear Terry

Selby District Local Development Framework Core Strategy Issues and Options Consultation

Thank you for consulting the Assembly on the Core Strategy: Issues and Options Report for Selby District. As you know, we are committed to working with local authorities in the preparation of their Core Strategies early on in the process, before we have to offer a formal opinion of general conformity with the Regional Spatial Strategy (RSS) at submission stage. At this point in the process, the Assembly response to consultation is an informal officer response, highlighting any key issues that we think need further attention. Whilst the consultation is structured around a questionnaire, it didn't seem appropriate to fill this out, as the comments we have are more strategic in nature.

The Assembly welcomes the way in which the Issues and Options are set within a broader context, including the RSS, and the list of spatial objectives that sets the scene for the document. In particular, these reflect the aim of existing RSS (December 2004) to guide development to sustainable locations (Policy P1) and the Yorkshire and Humber Plan (Draft RSS December 2005), which reinforces this approach and is more specific about the desired location of development in Policies YH1 to YH9. These clearly provide a policy context and direction that emphasises the need to provide for sufficient development in Principal Service Centres for them to fulfil their important role and to allow limited development in Local Service Centres, primarily to meet local need for affordable housing and to enable economic diversification.

Given this context the main point that we would make at this stage is that we would wish to see such a locational strategy reflected in the preferred options document when it is prepared. We would wish to see the role of Selby developed as a Principal Service Centre providing a local focus for housing, economic and other development.

The smaller Local Service Centres of Tadcaster and Sherburn-in-Elmet would be the focus for meeting local needs for affordable housing and enabling economic diversification, with a clear difference being made between their role and that of Selby. This locational strategy would need to be developed in the local context that the Selby District provides and this clearly brings some particular challenges with it, such as those related to flood risk. What we wish to stress at this stage is that some of the options for location of development that are presented in the Issues document (Options 3 and 4) would immediately start to unpick the spatial strategy of the RSS and this could not be supported by the Assembly.

We welcome the prominent summaries of draft RSS throughout the document. It would more accurately reflect the status of the RSS if in the paragraph (page 3) starting "Although the draft RSS...", the term policies is used rather than guidelines. At least initial reference should also be made to existing RSS (based on the selective review of RPG 12, December 2004), though the consultation paper correctly points out that draft RSS (the Yorkshire and Humber Plan submitted to the Secretary of State in December 2005) has significant "weight".

Throughout the document, the references to the Community Strategy and other complementary strategies and the role of the LDF in providing the spatial expression of these are welcome. We welcome the references to sustainability appraisal, the appointment of consultants to undertake such appraisal and the commitment to integrating appraisal into the selection of a preferred spatial option.

Vision and Objectives (page 5)

The Vision is to be supported. We would however suggest that there should be clearer differentiation between the District's major settlements – Selby, Sherburn-in-Elmet and Tadcaster, with Selby being the Principal Service Centre. We welcome the clearly articulated and generally sound set of objectives particularly the prominent statements relating to minimising the need to travel by car, reducing out migration and encouraging the provision of transport infrastructure in tandem with new development. These are essential ingredients of a more sustainable pattern of development. Within the objectives or as an additional objective, it would perhaps be helpful if greater reference were made to achieving a pattern of development in accordance with draft RSS Policies YH1 to YH9.

Issues - Role of Selby District (page 7)

The paper correctly gives prominence to the high rate of out migration to work and the contribution of these journeys to congestion elsewhere. It is heartening that the existing District Plan and other complementary plans recognise this issue and contain measures to address it. This approach may need to be strengthened in the LDF but the District will be starting from a sound policy base. However, it is perhaps a concern that options 2, 3 and 4 (set out on pages 35/36) would not help to address this issue (as identified in the table on page 37 of the issues paper).

A description of Selby's role could be developed from "*a Principal Service Centre serving a predominantly rural hinterland, contributing to the sustainable development of the wider sub-region by a close and sustainable relationship with higher order centres, especially Leeds and York*". There is no doubt that the LDF should strive to limit and reduce commuting, especially by car, to surrounding towns and cities.

Affordable Housing (pages 10 and 14/15)

The paper rightly draws attention to the affordable housing issue and the draft RSS policy. The District should be commended for having recently commissioned a housing needs study and progressing a Supplementary Planning Document to deal with Developer Contributions. The emphasis on addressing the affordable housing issue is welcomed. A strong approach is necessary and as acknowledged in the paper, a local policy, stronger or different to national or regional "guidelines" can be justified by local circumstance and a suitable evidence base eg Housing Needs Assessment (Draft RSS para13.47). Unless there are exceptional circumstances, the only development suitable in the smaller villages will be that needed to meet local needs. This important principle needs to be very clear in the LDF.

Managing Housing Markets (page 11)

It is agreed that further work will be necessary to establish housing markets and their relationships. This will require collaboration between disciplines and administrative areas and will be a challenge for the ongoing policy evolution in this and other areas.

Windfalls (page 12)

We would suggest that policy should be informed by an understanding of the role of settlements and whether their sustainability can be enhanced by development of a particular type. A "windfall" policy that results in an increase in market housing and further car commuting from villages would not be supported. The analysis in your paper rightly points to the potential conflict with draft RSS policy if windfall sites were to come forward in settlements that challenged the supported settlement hierarchy. However, if it were made clear that windfall sites could come forward that would support provision of affordable housing or essential local services these would be more easily supported.

Residential Densities (page 13)

The District is commended for promoting the "lifetime homes standard" and for the emphasis on design. This rightly promotes a debate about the appropriate densities for potential development sites in the area. The principle of higher densities in the more urban areas is sound and consistent with the objective of concentrating rather than dispersing development. However it should not be implied that significant development is likely to be permitted in the rural areas or villages. This would be contrary to the policy of consolidation and concentration of development that is central to draft RSS. Policies for distribution of development must prevail. Development to meet necessary local needs, whether housing or other services, can be influenced by briefs or local design statements which would establish with justification the most appropriate density for a particular site or area.

Lifetime homes / Travellers and Gypsies (page 15)

The suggestions in the paper relating to Lifetime Homes, Gypsies and Travellers, Community Safety and Local Facilities are commended and supported as helping to contribute to creating successful and sustainable communities. During the next stage of the Core Strategy's preparation it would be helpful if a link could be made to the work that the Assembly is currently undertaking on the needs of travellers and gypsies in the region.

Jobs and Business (page 16)

The paper provides an accurate summary of draft RSS and rightly “connects” to the Sub-Regional Investment Plan and the District Council’s Economic Strategy which set out priorities for the area. References to town centre renaissance at Selby, Sherburn and Tadcaster should differentiate the roles of these settlements, the former being the Principal Service Centre and the latter Local Service Centres. In view of the recognised need to reduce the volume of out commuting especially by car and to create a better home/jobs relationship, every effort must be made to ensure that there is an attractive range of employment land available in the right locations for the diversification and growth of the local economy. Local assessments will therefore be important in putting the regional policy into action. In line with draft RSS, pressure to accommodate housing on key employment land should be resisted.

Environment (page 20)

The paper demonstrates an appreciation of the value of the natural and built heritage and the general thrust of measures for protection, conservation and good design is supported.

As regards Climate Change, a number of important issues are very pertinent to the Selby area. The thrust of draft RSS relating to Climate Change, emissions and adapting to the impacts of climate change are included in the paper and this is to be welcomed. As regards reducing greenhouse gases, it would be helpful if the role of land-use policies in reducing the need to travel (especially by car) were acknowledged.

It is perhaps surprising that there is little reference in the paper to the major coal fired power stations in the area, their impact on emissions, their future, and the planning implications of alternative futures for the stations and/or conversion to use of bio-mass. These are important issues that may need to be addressed by the planning system. Reference should be made to Policy ENV5 of draft RSS in relation to the utilisation of community heating scheme opportunities near major sources of power generation near Selby.

As regards flood risk, the paper rightly draws attention to the “tension” between concentrating future growth in the Selby area and steering new development to the areas with the lowest probability of flooding. A word of caution should perhaps be injected here, as the need to locate development away from areas of high risk if at all possible (not least as current levels of protection cannot be guaranteed) should be emphasised. It is noted that there will be an updated and comprehensive Strategic Flood Risk Assessment (SFRA), which will be essential to inform the ongoing debate. The Assembly wishes to be kept informed of the progress of this work and would be pleased to offer further views on the pattern of future development when the updated SFRA is available.

Travel and Accessibility (page 29)

Having regard to the Local Transport Plan, Local Plan and Community Strategy, Selby starts from a sound policy base in developing the travel element of the Core Strategy. References to parking policy, park and ride, and promoting public transport for commuting are welcomed.

Distribution of new development (page 34+)

The issues paper accurately summarises the appropriate draft RSS and other policies that set the context within which the Selby Core Strategy will be developed. The spatial strategy that has been set out at a regional level seeks to meet the objectives of sustainable development. It encourages a concentration of development to ensure that a series of sustainable settlements can develop across the region, aiming to reverse a trend of dispersal that has not helped to meet the needs of the region. The Issues paper presents much contextual material that supports this approach. However, it then presents some options that could be seen to seriously challenge these objectives and that, if they were carried forward, would create a Core Strategy that would not be in general conformity with existing or draft RSS.

Option 1: "Growth concentrated in Selby town and adjoining parishes"

This option represents one of concentration and is the option that most closely reflects the spatial strategy of existing and draft RSS in helping to meet sustainable development objectives. In developing this option further, it will be important to be clear about the identification and potential coupling of centres, for example should Brayton and Thorpe Willoughby be regarded as part of the Selby Town urban area and should South Milford be part of the Sherburn Local Centre? Local needs for affordable housing and economic diversification will be the prime determinant of the amount of development in the Local Service Centres (see draft RSS Policy YH8 A iii), with the identification of development sites influenced by Policy YH8 B and C of draft RSS. Given the geography of the Selby District it will clearly be important to establish how the locational strategy can meet both the objectives of concentrating development, meeting local needs and addressing environmental (including flood risk) challenges.

Option 2: "Principal and Local Service Centres Strategy"

This option suggests that a greater proportion of development could be distributed across Local Service Centres in the District than would be the case in Option 1. Policies in draft RSS support the distribution of development where it would help to meet local needs and support the vitality of settlements. The Assembly would be unlikely to support a strategy that proposes development in excess of that required to meet such objectives, so it will be important in considering this option further to be clear about how development will help to meet sustainable development objectives. If the distribution of development were to lead to negative impacts such as those identified in the Issues paper, this option would be more problematic.

Option 3: "Service Centres and Largest Villages Strategy"

This option would conflict with the locational policies in existing and draft RSS.

Option 4: "Dispersed Growth Strategy"

This option would conflict with the locational policies in existing and draft RSS.

I appreciate that preparing options for debate can be difficult and can result in what might be seen as more extreme scenarios being published in order to generate a reaction. Perhaps the debate over these options will help to broaden the understanding of what constitutes a sustainable settlement pattern. However, it is important to note that the Core Strategy for Selby would not be in general conformity with existing or draft RSS if its spatial strategy were to be developed in line with Options 3 or 4 as set out in the Issues and Options Report. We would suggest that Options 1 and 2 therefore need further refinement and definition.

I hope that these comments are helpful to you. The paper raises many important and valid issues and presents contextual material that should prompt a good debate. The concerns expressed above should not detract from our positive interpretation of the remainder of the paper.

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.

Regards

A handwritten signature in blue ink, appearing to read 'Jenny Poxon', written in a cursive style.

Jenny Poxon
Head of Planning Delivery and Conformity