

Forward Planning Manager Selby District Council

By Email only

Economy and Place Directorate Forward Planning West Offices Station Rise York YO I 6GA

18 March 2021

Dear Ms Skelly,

Response to Selby District Council's Preferred Options Local Plan (2021)

Thank you for providing us with the opportunity to comment on Selby District Council's Preferred Options Local Plan (2021). Acknowledging the range of planning matters addressed by the emerging Local Plan for Selby, we are keen to ensure there is ongoing engagement with Selby District Council in relation to progressing final options and in constructively moving towards Submission. We highlight the following further matters for consideration at this stage.

Additionally, we continue to support the approach taken by the City of York and Selby District Councils through the Duty to Co-operate, to meet their own objectively assessed housing needs within their own administrative areas, as agreed in the Joint Position Statement between the City of York and Selby District Council in relation to the Housing Market Area, April 2020 [CYC examination library ref: EX/CYC/38]. We recognise that there are clear, functional links between York and Selby Districts and both authorities have worked together, through the Duty to Co-operate, to ensure that housing needs are fully met across the Housing Market Area.

Spatial Strategy

We support the Plan's general approach to strengthen, through regeneration, the role of Selby as the Principal Town, and sensitive heritage-led regeneration in Tadcaster, acknowledging the constraints of adjacent Green Belt. Notwithstanding our concerns in relation to the specific development option at Stillingfleet (see further detailed comments below), we acknowledge that the Plan appropriately reflects

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NPPF2019 (para 72) in presenting options to address its development needs in a sustainable way, including through planning for a new community which will develop within Garden Village principles. We further note that the approach references NPPF2019 (para 137), and prioritises sustainably located non-green belt sites.

Housing requirement and supply

The published 'Housing and Economic Development Needs Assessment (Oct, 2020)' (HEDNA) undertakes an assessment of local housing need using the Standard Method and determines housing need in Selby District as 342 dpa. Reflecting NPPF para 60, this figure represents the minimum number of homes needed. While the Standard method removes consideration of economic growth, Local Authorities are still required to align housing and economic strategies, and we acknowledge that the Plan supports an economic growth led strategy, with its focus on ensuring greater levels of in-commuting and self-containment of jobs. We note that the HEDNA advises "...the Council will need to increase housing need by a modest amount to service the employment potential at the strategic sites. The scale of uplift will ultimately depend on where the workforce is being drawn from." In response, Policy SG2 sets out housing requirement for the District of 8040 dwellings/402 dpa (reflecting 382dpa growth from modelled delivery of Strategic employment sites, plus 5% buffer to provide flexibility and ensure sufficient delivery where sites may not come forward).

Noting the planned housing requirement of 402dpa, the projected oversupply of 1,220 dwellings represents an additional 3 years of delivery. Given the shared Housing Market Area, we welcome further engagement to understand the potential impacts of delivering at this level of oversupply.

	Plan housing requirement
	(402dpa)
2020-2040	8040
Preferred Option	6967
Committed supply	2293
Residual	1220 oversupply

Employment land supply

We note that the published HEDNA suggests that there is sufficient supply of employment land to meet development needs in the District in the Plan period, however the Plan allocates sites at Gascoigne Wood and Olympia Park for sustainable economic growth. We note the ambitions of the council to ensure choice and churn in the market and additional land to meet economic growth aspirations. Whilst we accept we are currently both meeting our development needs, we would

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welcome further discussion in relation to employment growth where opportunities arise to address cross boundary growth in certain employment sectors.

New Settlement Options

As is highlighted above, NPPF2019 is supportive of planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. The emerging Plan is clear that the new mixed use settlement will be brought forward as comprehensive phased development, in accordance with an agreed masterplan, and within the 9 Guiding Principles for Garden Villages.

We are concerned that Land South of Escrick Road, Stillingfleet (STIL-D) does not represent a suitable or sustainable location for development. The capacity of the A19 is a critical issue for York as this is a key commuting route between the two authorities. The cumulative and significantly adverse impacts to the capacity of our road infrastructure would be difficult to resolve, even with proposed mitigation (likely to be required within the CYC area and especially at the A19/A64 junction). It is therefore our view that we could not support a new settlement in this location. Should this option be pursued we would welcome more detailed discussions to allow us to feed into future cross-boundary transport modelling, and to understand the potential impacts for York.

It is our view that Church Fenton Airbase (CFAB-A) offers the greatest potential for a sustainable new community. In particular, Church Fenton station and its linkages to both York and Leeds could positively impact modal shift in terms of travel patterns. Land is 100% brownfield, and the majority non-agricultural. Further, the site's proximity to growing digital/creative industries offers potential reciprocal benefits. In the context of the sub-region's commitment to zero-carbon and the Plan's Climate Change objectives, we consider the site has much positive to offer.

Habitats Regulations Assessment

The District has a number of areas which are important ecological habitats, including the River Derwent, Lower Derwent Valley and Skipwith Common which have both European conservation status and are nationally important Sites of Special Scientific Interest (SSSI), and which have shared boundaries with York. We draw your attention to the published "Habitats Regulations Assessment of the City of York Council Local Plan" (Oct 2020, published Dec 2020) and in particular the identified likely risks to these sites from plans and projects, alone or in



combination. We would welcome further discussion to align evidence and assessment in relation to these important sites.

Climate Change

York and North Yorkshire LEP have committed to making the region the UK's first zero carbon city sub-region. Climate change is a key challenge facing the District, and we support that the emerging Plan identifies climate change specifically and across Plan objectives, including through encouraging resilient and adaptive measures. We particularly note that the emerging Spatial Growth strategy embeds this objective in policy across the following aspects:

- reduced emissions through sustainable design policy and promoting adaptation of existing buildings;
- locating new development in sustainable locations, low carbon travel and ensuring new residential development provides electric car charging;
- supporting new advances in carbon capture, agri-technology and renewable energy development,
- improvements to the natural environment, recognising the role of habitats in carbon sequestration and supporting significant new tree planting, hedgerows and creation of wetlands.

We trust our response represents constructive input in progressing Selby District's Local Plan, and we look forward to further ongoing discussion. In the meantime, if you should wish to discuss this response further please do get in touch.

Yours Sincerely

Michael Slater

Michael Slater

Assistant Director for Planning and Public Protection

