



Selby District Council  
Local Plan Consultation

**"PLAN Selby"**  
**(The Sites and Policies Local Plan)**

**Initial Consultation Comments Form**

"PLAN Selby" is the Sites and Policies Local Plan which the Council is developing to deliver the strategic vision outlined in the Core Strategy that was adopted in 2013. When adopted, PLAN Selby will form part of the Local Plan for the District against which planning applications will be assessed.

This consultation is the first stage in our on-going dialogue with you and we hope that you will take time to respond to it and help us move forward. The responses to this consultation will help inform our work and shape the District for the future.

**Comments are therefore invited as part of this Initial Consultation.**

**Please use this form to make your comments.**

Please read the main document PLAN Selby and associated papers, which are available on the Council's website at [www.selby.gov.uk/PLANSelby](http://www.selby.gov.uk/PLANSelby) and at local libraries and Public Council offices.

You will need to see what is in PLAN Selby in order to make your comments. It contains a wide range of issues and specific questions on which we would like your views. Please make sure you are clear about which part of PLAN Selby you are commenting on and ensure we have your full contact details so we can take your comments into account and so that we can contact you about the next stages.

**Completed comments forms must be received by the Council  
no later than 5pm on Monday 19th January 2015**

**Contact Details** - Please provide contact details and agent details, if appointed

Personal Details

Agent Details (if applicable)

Name	J. E. Clark
Address	c/o Savills
Postcode	
Telephone no.	
Email address	

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It will be helpful if you can provide an email address so we can contact you electronically

**Comment(s)**

Please ensure you provide reference to the Question and Topic area for each comment you wish to make.

Topic / Chapter

Question no.

Paragraph

Please see attached correspondence

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

Topic / Chapter

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Paragraph

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**Additional Comments** - Please provide any additional comments you may wish to make.

Please see attached correspondence

(Text is limited to the available area to ensure all text is visible. Continue on a separate sheet if necessary)

**Comment Submission Statement**

All comments must be made in an email or in writing if they are to be considered. Your comments and some personal identifying details will be published in a public register and cannot be treated confidentially. Where practical, personal identifiers may be redacted, however Selby District Council cannot guarantee that all identifiers will be removed prior to publication of consultation records.

Signed

Savills (UK) Ltd

Dated

19.01.15

**Please ensure you save a copy of your completed comments form to your computer before sending by email**

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no later than 5pm on Monday 19th January 2015**

Email: [ldf@selby.gov.uk](mailto:ldf@selby.gov.uk)

Post to: Policy and Strategy Team, Selby District Council, Civic Centre,  
Doncaster Road, Selby YO8 9FT

19<sup>th</sup> January 2015

Written Reps PLAN Selby J. E. Clark 19.01.15



**Policy and Strategy Team**  
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Dear Sirs

### **PLAN Selby – The Sites and Policies Plan Initial Consultation**

Savills is instructed by J. E. Clark to submit representations to the emerging PLAN Selby process with a specific focus on the Sites and Policies Local Plan – Initial Consultation. Our clients land holdings include land immediately adjacent to the development limits of Selby.

As a landowner within the District of Selby our clients wish to be a pro-active participant in the Development Plan process and to develop an effective working relationship with Selby District Council. Our clients therefore intend to play a full and active role in ensuring that the wider planning strategy and framework for Selby is deliverable in the timescales envisaged by the planning process.

The representations provide comments on specific and relevant questions raised within the PLAN Selby – Sites and Policies Plan Consultation document. Our clients appreciate the PLAN Selby Sites and Policies Plan is still at a very early stage of production and seek to provide further representations on specific site allocations in due course. It is recognised the Council are not consulting on specific sites at this stage, these representations include very brief comments on the land under the ownership and control of our client and more detailed comments on the wider development principles within Selby which are currently being consulted upon.

### **The Site**

The site is known as land at Monk Lane, Selby. It totals circa 33ha in area and lies outside, but immediately adjacent to, the development limits of Selby.

The site has previously been submitted by the landowner for consideration and assessed within the Selby SHLAA in 2012 and 2013. The site is subsequently included within the Call-for-Sites Map Book which has been published to accompany the PLAN Selby consultation (refs: SELBY/005 and SELBY/006). The site is split into two halves. However, there is nothing to stop the site coming forward as a whole, in part or on a phased basis depending on the circumstances going forward.

Our client seeks the allocation of this site for residential development. Should the Council resolve to allocate this site for development then it is important to highlight that it is available and deliverable in a short term period of 0-5 years.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East

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## PLAN Selby – the Sites and Policies Plan Initial Consultation

### Chapter 3 – Key Issues

#### T1 Providing Homes

- Q7     *a. do you agree with the proposed approach to the base date?  
b. do you agree with the broad principles of the calculation method?*

Our client supports the start date of 31 March 2015 as the baseline for the Sites and Policies Plan as this will provide the most up to date monitoring information available at the time of writing. The Sites and Policies Plan timescales should align with the Core Strategy plan period from 2011 -2027. The Sites and Policies Plan should be able to adapt to changes in circumstance such as the new Strategic Housing Market Assessment due to be published this year. In other words, the Plan should align to the Core Strategy, but be based on the most accurate therefore recent information available.

- Q8     *a. should PLAN Selby over-allocate to allow for any non-delivery on the allocations? By what method and by how much?  
b. How should PLAN Selby seek to allocate sites in such a way as to secure delivery over the whole plan period?  
c. is there opportunity to have contingency sites in case others are not delivered elsewhere in the District? How might the contingency sites release be managed to maintain a 5 year housing land supply?*

The Core Strategy identifies the need to deliver 7200 new homes across the District over a 16 year period to 2027. This means Selby District Council need to deliver at least 450 new homes per year, excluding windfalls.

We support the continued focus on Selby as the Principal town for development.

A total of 3700 dwellings is planned for Selby over the 16 year Plan Period. In Selby 1000 new dwellings will be delivered through a mixed use urban extension to the east of the town (Olympia Park). Smaller scale sites within and/or adjacent to the boundary of the Contiguous Urban Area of Selby are therefore required to accommodate a further 1500 dwellings which will need to be identified. Our client supports the cautious approach by the Council to include a 10% allowance for non delivery in regards to the Core Strategy minimum requirements for housing.

We consider the Council should prepare the Plan with contingency sites included to allow for either non delivery of existing sites, delayed delivery of existing sites or a change to the overall housing requirement caused by, say, revised ONS or other population projections. This will build inherent flexibility into the Plan and allow it to have a greater life span. Such contingency sites should be governed by a safeguarding type policy. This would enable the debate to change from whether such sites should be released for development to when such sites should be released for development. This will help ensure that longer term development needs are met without automatically necessitating the need for a Local Plan review with the consequential delays. In other words, such an approach will make the planning system more responsive.

- Q10    *The Core Strategy sets the 'rules' for choosing sites; but do you have any views on the relative importance or weight to be attached to the criteria for site selection?*

The approach to allocating land needs to be amended to reflect the settlement hierarchy and the flood risk circumstances of the District. The Core Strategy has determined that Selby will be the principal location for additional development as this is the most sustainable settlement in the District. The approach for allocating land needs to reflect this. For example, it is more sustainable to allocate a Greenfield site immediately on the edge of Selby than a previously developed site which is located in a Secondary Village.

Equally, the Flood Risk situation needs to reflect the position of a particular site / location in the settlement hierarchy. The Local Plan process identifies location for growth by reconciling numerous, sometimes competing, land use considerations, including flood risk. For example, it would be more sustainable overall, to direct new growth to settlements such as Selby which is within Flood Zone 3 than to a Secondary Village that is within Flood Zone 1.

## T2 Promoting Prosperity

### Employment Land Allocations

It is acknowledged that Selby District Council need to allocate 37 – 52 hectares of employment land to create jobs within the District. The Olympia Park Strategic Development Site is set to provide around 23 hectares up to 2027 leaving a requirement for a further 14-29 hectares of employment land throughout the District.

Our client supports the principle of allocating the majority of employment land in and around Selby urban area. Our client supports the focus on higher value Business, Professional and Financial Services/B1 office development in and around Selby town urban area.

We would urge the Council to take a cautious approach to allocating the majority of employment growth at the Olympia Park Strategic Development Site and ensure there are sufficient contingency sites allocated in the remainder of Selby to allow for either non/delayed delivery of existing sites or a change to the overall employment requirement. This will build inherent flexibility into the Plan and allow it to have a greater life span. Such contingency sites should be governed by a safeguarding type policy. This would enable the debate to change from whether such sites should be released for development to when such sites should be released for development. This will help ensure that longer term development needs are met without automatically necessitating the need for a Local Plan review with the consequential delays. In other words, such an approach will make the planning system more responsive.

We would encourage the Council to revisit the employment requirement following an Employment Land Review and Retail, Commercial and Leisure Study. The results of which should influence both the scale and location of future employment land and ensure the plan is based on accurate and up to date evidence.

**Q15** *a) What approach should be taken on the existing Established Employment Areas as defined in the Selby District Local Plan 2005?*

*b) Is there a need for a detailed policy to apply to the Established Employment Areas?*

We would encourage the Council to review the existing Established Employment Areas as defined in the Selby District Local Plan 2005. It is important to establish if the existing employment areas are still most suited to an employment use and not to apply an overly restrictive approach to the re-use of existing employment sites if it is no longer the most sustainable option when the Council has other significant development needs to address such as residential.

We would also encourage the Council to take a flexible approach to allocations for employment use and promote opportunities relating to recreation and leisure uses where appropriate. This could be achieved through increased allocations for a mixed use so as not to restrict sites solely for an employment use and increase the probability of sites coming forward for development.

We would discourage the Council in applying detailed policies and over restrictive policies to existing employment areas.

**Q16** *In the Selby District Local Plan, all Employment Allocations were considered suitable for all types of employment use (B1, B2 and BB). However in the light of the different roles of each of the towns, should PLAN Selby consider a different approach, for example being more specific about the types of employment uses on particular sites?*

We would encourage the Council to take a flexible approach on employment allocations to enable the Plan to respond to the market and changes to the overall employment requirement. This will also prevent the need for a Local Plan review should circumstances change within the Selby district.

### **T3 – Defining Areas for Promoting Development and Protecting Key Assets**

Q22 *Should the Development Limits be drawn tightly to maintain the settlement pattern, or loosely around the settlements to enable sympathetic development?*

Q23 *a) Where should the boundaries of the new Strategic Countryside Gap between Selby and Thorpe Willoughby be drawn?*

*b) Are the boundaries of the other existing Strategic Countryside Gaps still appropriate?*

We believe the development limits should be drawn loosely around the settlements to enable sympathetic development and allow for a degree of flexibility for developers to enable sites to come forward for development. This increased flexibility creates more certainty that Selby will be able to deliver the minimum housing and employment land targets.

In any event, we would recommend the use of contingency sites (see above), particularly if this flexible boundary approach is not be adopted. This will ensure greater longevity of the Plan.

#### Flood Risk

Planning is a land use system which has to balance a number of factors, including flood risk. The Environment Agency map confirms that the majority of Selby is within Flood Zone 3. Given the importance of Selby as the principal settlement, flood risk should not be considered as a barrier or an in-principle objection where technical solutions are available. This has to be the position for Selby to be the principal town and the focus for growth. The Selby District Council SFRA identifies a number of Flood Warning Areas. Land and buildings outside these areas should be the focus of new development in the first instance.

We are fully aware of the flood risk within the Selby area and our client sits on the Local Drainage Board. The site at Monk Lane falls outside the Flood Warning Area.

We look forward to continuing to be an active participant in the Local Plan process going forward. In the meantime, if you have any queries, please contact Adam Key or Rebecca Housam at this office.

Yours faithfully

Savills (UK) Ltd