

Selby District

Submission Draft Core Strategy

Publication Version January 2011

Representation Form

Part A

In completing this representation form, you are providing a formal consultation response under Regulation 27 of the Town and Country Planning (Local Development)(England) Regulations 2008 with regard to the Selby District Submission Draft Core Strategy DPD on grounds of soundness only.

Please complete separate copies of Part B (pages 3 and 4) of this form for each section, policy, table, map or diagram about which you wish to comment.

If you believe that a section, policy, paragraph, table, map or diagram is unsound with regard to more than one test of soundness please provide a separate representation for each test.

The Tests of Soundness

Soundness is explained in PPS12 (Planning Policy Statement 12) in paragraphs 4.36 - 4.47, 4.51 and 4.52 and the boxed text. Specifically paragraph 4.52 states that to be sound a Core Strategy should be:

1 Justified

PPS12 provides that to be 'justified' a DPD (in this case the 'Core Strategy') needs to be :

- founded on a robust and credible evidence base involving:
 - evidence of participation of the local community and others having a stake in the area
 - research/fact finding - the choices made in the plan are backed up by facts
- the most appropriate strategy when considered against reasonable alternatives

2 Effective

PPS12 states that Core Strategies should be effective. This means:

- Deliverable - embracing:
 - Sound infrastructure delivery planning
 - Having no regulatory or national planning barriers to delivery
 - Delivery partners who are signed up to it
 - Coherence with the strategies of neighbouring authorities
- Flexible
- Able to be monitored

3 National Policy

The DPD (in this case the 'Core Strategy') should be consistent with national policy. Where there is a departure, the Local Planning Authority (LPA) must provide clear and convincing reasoning to justify their approach.

Completed representation forms must be returned to the Council no later than 5pm on Monday 21st February 2011.

Email to: ldf@selby.gov.uk (Please save a copy to your computer prior to e-mailing your response)

Post to: LDF Team, Development Policy, Selby District Council, Civic Centre, Portholme Road, Selby YO8 4SB

Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

	Personal Details	Agents Details (if applicable)
Title	Mr & Mrs	
First Name	C	
Last Name	Lewis	
Job Title (where relevant)		
Organisation	Lampertia Ltd	
Address Line 1	Camblesforth Hall	
Address Line 2	Brigg Lane	
Address Line 3	Camblesforth	
County	North Yorkshire	
Postcode	YO8 8HJ	
Telephone No.		
Email address		

You only need to complete this page once. If you wish to make more than one representation, attach additional copies of Part B (pages 3 and 4) to this part of the representation form.

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

Part B (please use a separate sheet (pages 3 and 4) for each representation)

Please identify the part of the Core Strategy to which this representation refers:

Section No.	<input type="text" value="4"/>	Policy No.	<input type="text" value="CP1"/>	Paragraph No.	<input type="text" value="4.13"/>
Map No.	<input type="text" value="4"/>	Figure No.	<input type="text"/>	Other	<input type="text"/>

Question 1: Do you consider the DPD is:

1.1 Legally compliant Yes No

1.2 Sound Yes No

If you have entered No to 1.2, please continue to Q2. In all other circumstances, please go to Q3.

Question 2: If you consider the DPD is unsound, please identify which test of soundness your representation relates to:

(Please note you should complete separate Part B (pages 3 and 4) of this form for each test of soundness the Core Strategy fails.)

2.1 Justified (Please identify just one test for this representation)

2.2 Effective

2.3 Consistent with national policy

Question 3: Please give details of why you consider the Core Strategy DPD is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Please see response to Question 3 at the end of this form.

Question 4: Please provide details of what change(s) you consider necessary to make the Core Strategy DPD legally compliant or sound, having regard to the test you have identified in Q2 where this relates to soundness. You will need to say why this change will make the Core Strategy DPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The inclusion of Camblesforth within the list of 'Designated Service Villages'. This would in the context of Camblesforth address what is considered be an 'unjustified' exclusion of the settlement from the list of villages that will have some scope for additional growth to support rural sustainability.

(Continue on a separate sheet if submitting a hard copy)

PLEASE NOTE your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination. For further information on the stages see The Planning Inspectorate website (http://www.planning-inspectorate.gov.uk/pins/appeals/local_dev/index.htm)

Question 5: Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate at the oral part of the examination?

5.1 Written Representations

5.2 Attend Examination

5.3 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

(Your request will be considered by the Inspector, however, attendance at the Examination in Public is by invitation only).

Representation Submission Acknowledgement

I acknowledge that I am making a formal representation under Regulation 27 of the Town and Country Planning (Local Development)(England) Regulations 2008. I understand that my name (and organisation where applicable) and representation will be made publically available during the public examination period of the Core Strategy in order to ensure that it is a fair and transparent process.

I agree with this statement and wish to submit the above representation for consideration.

Signed

Dated

Question 3

The proposed settlement hierarchy Policy CP1 is considered to be unsound and fails the tests in Para 4.52 in PPS12 in that it is not considered that its draft strategy or selection of settlements has been justified. The selection criteria for the Designated Service Villages has not been backed up by fact in the Submission Draft Core Strategy (SDCS) or background paper No. 3 Housing Options. The Council have not provided a substantive case to justify the selection of Designated Service Villages listed in Policy CP1 and it is not considered that reasonable alternatives for the inclusion of other settlements have been fully considered.

The designation of Camblesforth as a Secondary Village rather than a Designated Service Village is, we consider, unreasonable.

The adopted local plan Part 2 - Settlement Statements advises that Camblesforth had a concentration of recent residential developments, employment opportunities including Drax Power Station, a strategic infrastructure facility, a good range of shops and associated services, school and regular bus services to Selby and Goole. It acknowledged that the level of services and close proximity to employment suggests there is potential for future growth.

Policy CP1.A(b) downgrades Camblesforth to a role as a Secondary Village only able to absorb limited development within the development limits rather than the more representative scope for additional residential and employment growth that would be attracted by a listing as a Designated Service Village. It is not considered that the SDCS has provided any substantive justification as to why Camblesforth has not been included as a Designated Service Village.

Para 4.25 advises that Designated Service Villages have been selected as:- "Villages which have a good range of local services". Camblesforth, by the Council's own admission in the Local Plan was identified as having a good range of services and other facilities; significant employment opportunities and level of services that justified potential for future growth.

These services, employment opportunities and potential for future growth still exist.

Comparisons to the Council's objectives for the SDCS set out in Para 3.5 show Camblesforth to compare equally well to other Designated Service Villages in the plan area.

The supportive text in section 4 also appears contradictory and suggest selections were made at random rather than based on fact in choosing to allocate Designated Service Villages. For example in Para 2.33 the inclusion of Eggborough is stated to be linked to its location close to the power station, a strategic infrastructure site. Camblesforth is contiguous to Drax Power Station which is also a main employer and supports a much broader range of ancillary employment facilities.

Similarly in Para 4.10 reference is made to the relative overall sustainability of settlements being evaluated based on services, access to higher order services and employment opportunities as well as issues such as flood risk and land availability. Camblesforth has shops, post office, food outlets, a school and community/recreation facilities, there are major employment opportunities at Drax power station, English Village Salads and Yorkshire Fresh Fruit all within sustainable walking and cycling distance of the village. The village is only some 6.5 km. from Selby and there is a frequent (less than 1 hour intervals) bus service to both Selby and Goole both main local centres, and onward travel hubs with rail and road links.

In terms of land availability there are SHLAA land bids on several sites X032,033,034 and 035 which could be both available and deliverable and are within flood zone 2 which in accordance with PPS 25 Table D1 includes residential development as being a 'more vulnerable' but appropriate use.