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From: Dawn Sharp [REDACTED]
Sent: 21 December 2012 14:08
To: LDF; Helen Gregory
Cc: James Hall; Claire Harron; Butler, Paul
Subject: Further Consultation on the Selby Core Strategy - 7th Set of Changes & Associated Annexes

Follow Up Flag: Follow up

Flag Status: Red

Attachments: 18638.A3.CH.jh.ds.LtrSelbyDCReps7thSetOfChanges.121221.pdf

Please find attached our representations to the above on behalf of Barratt & David Wilson Homes, a hard copy of which will be in tonight's post.
Regards

Dawn Sharp
Branch Secretary

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JustGiving's Workplace Fundraiser of the Year 2012

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18638/A3/CH/jh/ds

21st December 2012

Dear Sirs

FURTHER CONSULTATION ON THE SELBY CORE STRATEGY – 7TH SET OF CHANGES AND ASSOCIATED ANNEXES

These representations are made on behalf of Barratt and David Wilson Homes with specific regard to the Selby District Council's (the Council's) proposed housing delivery figures as set out in its 7th set of proposed changes and associated annexes to the Core Strategy.

Barratt and David Wilson Homes previously made detailed representations in February 2012 which included a critique of the Arup report, its methodology and conclusions to support the Barratt and David Wilson Homes' view that 550 dwellings per annum should be planned over the plan period. Following this, further representations were submitted in April 2012 in response to the NPPF, and a critique of the North Yorkshire SHMA was submitted to the Examination in Public (EIP) in July 2012.

The Council's revised position as set out in the 7th set of proposed changes, is to retain the housing delivery target of 450 dwellings per annum (dpa) but to allow for an additional 105 dpa to be delivered through windfalls.

This presents a number of problems. Whilst it is known that windfalls (i.e. unforeseen sites) come forward to deliver housing, there are two issues with their inclusion in the land supply calculations.

The first is a fairly academic point but pertinent to considering the effectiveness of the planned housing supply. How can a windfall site, which by definition is not identified, realistically provide part of the five year supply of "specific, deliverable sites"?

Secondly and more seriously, the reliance on windfalls will only exacerbate a lack of housing supply in Selby, if the Council allocates too little land in the forthcoming Site Allocations DPD as a result of over-reliance on windfall sites.

There will be planned under-delivery of housing unless the Council is ambitious in taking a robust view of the level of housing need, and proves willing to maintain a consistent buffer of genuinely available sites, not relying on windfalls.



Guidance in Paragraph 47 of the NPPF sets out how local planning authorities should seek to significantly boost the supply of housing noting that they should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing, and that they should identify key sites which are critical to the delivery of the housing strategy over the plan period. The guidance goes on to state local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirement with an additional 5% buffer to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%.

The five year housing supply assessment starts from the overall requirement for housing, from which the five year requirement is calculated. If the Council takes its five year housing supply from the 450 dpa figure it will not be drawing from the figure required to meet its fully robust assessed needs and it will be planning for undersupply housing from the outset. Accordingly, the housing supply figure should be drawn from the 550 dpa figure i.e. $550 \times 5 = 2,750$ plus an additional buffer of 5% or 20%. Our clients favour the higher figure.

Barratt and David Wilson Homes therefore remains of the view that in order to achieve 'full objectively assessed housing needs' as required by the NPPF, the housing delivery target should be 550 dpa and should not include windfalls. Furthermore the five year housing supply should be based on the housing delivery target of 550 dpa.

In summary, Barratt and David Wilson Homes maintains that the evidence produced by the Council is not sufficiently robust to deviate from the most up-to-date figures, therefore a housing delivery target of 550 dpa should be included as detailed in our previous representations and supporting evidence. The five year housing supply should be based on the 550 dpa figure plus an appropriate buffer in order to ensure that the Council's full housing needs are met.

We trust these comments will be taken into consideration. Notwithstanding this, Barratt and David Wilson Homes' reserves it right to appear at the forthcoming EIP session in February to discuss its comments in further detail.

Yours faithfully



CLAIRE HARRON
Associate

Cc. Paul Butler Barratt & David Wilson Homes