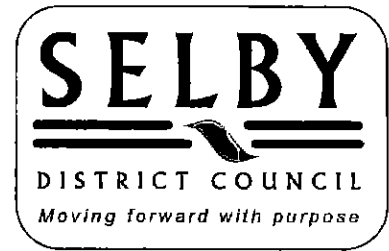


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Selby District Submission Draft Core Strategy Consultation on Further Proposed Changes (6th Set) June 2012 Representation Form

An Examination in Public (EIP) into the soundness of the Submission Draft Core Strategy (SDCS) was held between 20 and 30 September 2011 and between 18 and 19 April 2012 in front of an Independent Inspector.

The Independent Inspector has adjourned the EIP until 5 September 2012 in order to consider the implications of the National Planning Policy Framework (NPPF) on the Submission Draft Core Strategy and for the Council to consult on any further Proposed Changes to the Submission Draft Core Strategy.

Selby District Council is now publishing and inviting comments on a 6th Set of Proposed Changes to the Submission Draft Core Strategy (and associated documents) in order that all parties can make their views known.

The September and April EIP's have already heard the duly made representations on the Submission Draft Core Strategy which were submitted during the formal Publication stage and subsequent consultation on the first 5 Sets of Proposed Changes. The adjournment should not be used as an opportunity to revisit matters which have been fully considered during the September 2011 and April 2012 hearing sessions.

Representations are therefore invited as part of this consultation on the 6th Set of Proposed Changes to the Submission Draft Core Strategy and associated documents.

Please complete separate copies of Part B of this form for each of your separate representations. It would be helpful if you could focus on the "tests of soundness" and indicate if you are objecting on a legal compliance issue.

**Completed representation forms must be returned to the
Council no later than 5pm on Thursday 19 July 2012**

Email to: ldf@selby.gov.uk

Fax to: 01757 292229

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

Part A

The Tests of Soundness

The Independent Inspector's role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. The tests to consider whether the plan is 'sound' are explained under paragraph 182 of the National Planning Policy Framework (NPPF) (March 2012) and states a sound Core Strategy should be:

Positively prepared

- the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified

- the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective

- the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy

- the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Contact Details (only complete once)

Please provide contact details and agent details, if appointed.

	Personal Details	Agents Details (if applicable)
Name		MARK JOHNSON
Organisation	REDROW HOMES	DARES COMMERCIAL
Address	C/O AGENT	9 YORK PLACE LEEDS LS1 2DS
Telephone No.		0113 204 2247
Email address		mtj@hotmail.com

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

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

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

Please identify the Proposed Change (which can be found on the Published Schedule, CD2f) to which this representation refers or paragraph number of the NPPF Compliance Statement:

[Empty rectangular box for identifying the proposed change or paragraph number]

Question 1: Do you consider the Proposed Change 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 Proposed Change is unsound, please identify which test of soundness your representation relates to:

- 2.1 Positively Prepared (Please identify just one test for this representation)
- 2.2 Justified
- 2.3 Effective
- 2.4 Consistent with national policy

Question 3: Please give details of why you consider the Proposed Change is not legally compliant or is unsound and provide details of what change(s) you consider necessary to make the Proposed Change to the Submission Draft Core Strategy legally compliant or sound.

See attached comments

Question 3 continued

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

Question 4: 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?

4.1 Written Representations

4.2 Attend Examination

4.3 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).

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

Representation Submission Acknowledgement

I acknowledge that I am making a formal representation. I understand that my name (and organisation where applicable) and representation will be made publically available (including on the Council's website) 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

Dacres Commend

Dated

19/7/12

Selby Core Strategy – 6th Set of Proposed Changes

Response in relation to Papyrus Works, Newton Kyme.

PC6.19 – Policy CPXX – The references to Major Developed Sites have been deleted – The Council now considers that the national policy is sufficiently flexible to allow some development in Selby's existing Major Developed Sites and so such a designation is no longer necessary.

Papyrus Works, Newton Kyme was previously listed as a Major developed Site in the Green Belt, however this has now been deleted.

The proposed changes to Policy CPXX are in accordance with the NPPF.

NPPF paragraph 89 – Inappropriate development exceptions include:

"limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development."

PC6.39 – Windfalls – New paragraphs 5.28 – 5.28d

We welcome the additional paragraphs relating to windfall. They reflect the NPPF and we welcome the admission that the Council cannot be sure of the contribution that windfalls could make to the overall target.

Support 5.28c:

5.28c "to ensure certainty and deliverability the SADPD will allocate sufficient land to accommodate all of the housing target. Any windfalls will simply add to the District's overall housing completions."

Policy CP3 – Managing Housing Land Supply

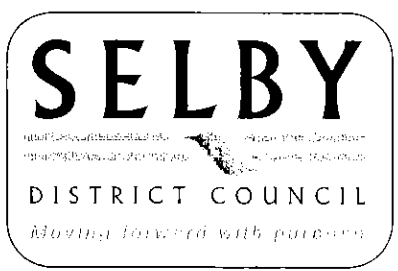
Reference to PPS3 should be removed from paragraphs 5.44b and 5.44c.

Paragraph 5.44d refers to a Core strategy PDL target of 40%. This should be deleted as it has been removed from Policy CP1 (PC6.31) and is referenced in paragraph 4.33 as an 'indicator' (PC6.25).

41



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SEE ATTACHED

Question 3 continued

[Empty box for Question 3 response]

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

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- 4.1** Written Representations
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[Empty box for Question 4.3 response]

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

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

Signed Ducres Commerid

Dated 12 / 7 / 12

Selby Core Strategy 6th Set of Proposed Changes

Response in relation to Sherburn in Elmet - Site SHB1/B.

PC6.31 – Previously Developed Land

The 40% PDL target has been deleted from Policy CP1 to comply with NPPF. We welcome this deletion, however paragraph 5.44d refers to a Core strategy PDL target of 40%. This should be deleted given that it has been removed from Policy CP1 (PC6.31) and is referenced in paragraph 4.33 as an 'indicator' (PC6.25).

PC6.37 – Housing Targets

Text has been inserted stating that housing targets are minimum requirements. We welcome this insertion.

PC6.39 – Windfalls – New paragraphs 5.28 – 5.28d

We welcome the additional paragraphs relating to windfall. They reflect the NPPF and we welcome the admission that the Council cannot be sure of the contribution that windfalls could make to the overall target.

Support 5.28c:

5.28c "to ensure certainty and deliverability the SADPD will allocate sufficient land to accommodate all of the housing target. Any windfalls will simply add to the District's overall housing completions."

PC6.40 - Phasing

We welcome the deletion of text at paragraph 5.40 in relation to phasing and the returning to a flat target.

However, the policy wording of Policy CP2 hasn't been amended and still includes 3 phases with a stepping up from 400 dwellings per annum in the first 5 years, up to 460 per annum and 500 per annum in the later 2 phases. We have been informed by the Council that this is an error and should not be included within Policy CP2. Likewise, the Housing Trajectory (Figure 9) needs amending to reflect the removal of phasing and show a flat rate of 450 throughout the plan period.

Whilst we welcome the deletion of phasing, we maintain our objection to the 450 dwelling per annum target. – The Position Statement to accompany the 6th Set of Proposed Changes (paragraphs 3.1 - 3.12) explains the Council's position in terms of the proposed 450 dwelling per annum figure.

Position Statement paragraph 3.9 states "whereas other parties consider that the figure should be higher (between 500 and 550), the Council remain of the view that the figure should be about 450 dpa which provides for objectively assessed needs in accordance with NPPF (para. 154) and which is aspirational but, crucially is realistic and deliverable based on both future economic expectations and past average completions." There is no real reasoning why the Council remain of this view other than that the figure represents a positive plan for growth which is still significantly above the jobs-led scenario B figure of 403 dpa set out in the NY SHMA, and that the economic outlook remains weak (paragraph 3.10 Position Statement). We do not consider this to be a reasoned argument.

We do welcome reference at paragraph 3.12 of the Position Statement relating to windfalls being over and above the 450 dpa minimum target. The Council state "Therefore the position of the Council, in planning for annual average household growth of 450dpa remains robust and reasonable. It must be noted that the 450 is a minimum target that the council considers it can reasonably achieve to ensure the success of the Plan, but that additional development that comes forward as windfall will add significantly to the minimum."

Policy CP3 – Managing Housing Land Supply

In light of the NPPF publication and replacement in particular of PPS3 it is considered paragraphs 5.44b – f should be deleted. These paragraphs make reference to PPS3 and also refers to the 40% pdl target which has been removed from Policy CP1 to align with the NPPF.

In relation to interim arrangements for maintaining the housing land supply paragraph 5.44n states that "The housing land Supply Period will be maintained by drawing on Phase 2 allocations identified in Policy H2 of the Selby District Local Plan, which have been released by the Council under the provisions of saved SDLP Policy H2A. Those policies are saved until superseded by the Site Allocations DPD." Yet, Policy CP3 deletes at Part B, reference to the pool of unimplemented Phase 2 allocations providing the source from which appropriate sites will be drawn. Clarification is required, as text is deleted in Policy CP2, yet not deleted in paragraph 5.44n.

PC6.69 – 6.70 – Sherburn in Elmet

We welcome the insertion of additional paragraphs relating to the potential intensification of existing employment land and the potential for employment growth in Sherburn particularly in the distribution sector.

PC6.96 – Design Quality

We welcome the insertion of paragraph 7.77a which states that the Council does not propose to set a development density figure but may identify particular design requirements including indicative densities as part of the DMDPD and / or specific allocations in the SADPD. We welcome the flexibility of this proposed change.